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Interim State Superintendent of Schools

TO: Members of the State Board of Education

FROM: Carey M. Wright, Ed.D., Interim State Superintendent of Schools 

DATE: December 5, 2023

SUBJECT: Summary of the Repeal and Replacement of COMAR 13A.12.01-.07 *Educator Licensure* and COMAR 13A.07.06 *Programs for Professionally Licensed Personnel*

Purpose

The purpose of this item is to provide a summary of the proposed replacement of Code of Maryland Regulations (COMAR) 13A.12.01-.07 Educator Licensure and 13A.07.06 Programs for Professionally Licensed Personnel and request permission to adopt both sets of regulations.

Background/Historical Perspective

In 2018, the Maryland State Board of Education (SBOE) and Professional Standards and Teacher Education Board (PSTEB) charged the Maryland State Department of Education (MSDE) with the task of repealing and replacing all of the chapters in Title 13A Subtitle 12 *Educator Certification* and 13A.07.06 *Programs for Professionally Licensed Personnel* to increase the rigor of educator preparation and certification in Maryland and incorporate recommendations made in the 2017 Teacher Induction and Retention Act Report and 2018 Commission on Innovation and Excellence in Education Preliminary Report. Over the course of several months, MSDE presented recommended language to both Boards for approval. In June 2019, the SBOE granted permission to publish the regulations for public comment. Before publication, and in anticipation of the Blueprint for Maryland's Future, the Joint Committee on Administrative, Executive, and Legislative Review (AELR) asked the SBOE to rescind their permission to publish the regulations and wait for the conclusion of the 2020 legislative session. The SBOE honored this request and rescinded permission to publish. After the 2020 legislative session, MSDE presented additional amendments to the regulations to align with the Blueprint for Maryland's Future.

Public Comment and AIB Feedback

In July 2021, both the SBOE and PSTEB granted permission to publish COMAR 13A.12.01-.07 and 13A.07.06 for public comment. The regulations were published in the Maryland register in January and February 2022. There were clear themes of concern shared in the public comments provided. Comments concerning the licensure regulations focused on testing requirements for teacher candidates, requirements for teachers assigned to teach out of their area of licensure, and requirements associated with the renewal of a professional license. Comments concerning the preparation regulations focused on placement and length of the practicum, requirements for mentors, licensure assessments, and exit requirements. Over the course of several months, PSTEB made several substantive changes to the proposed regulations based on public comments, AIB feedback, Maryland educator

data, and relevant research. The following table highlights amendments that were made based on public comments and AIB recommendations:

Stakeholder	Regulations	Feedback	MSDE Recommendation
Accountability and Implementation Board and Institutions of Higher Education	Educator preparation	The length of the practicum should not be prescribed as 180 days when the law states “equivalent to a full school year.”	MSDE modified the language to align with the language in the law.
Institutions of Higher Education	Educator preparation	The number of credits required in English language arts, math, science, and social studies (12 credits per subject) should not be prescribed for elementary programs.	MSDE modified the language to require content coursework in each of the four areas; however, a minimum number is not required. Programs must demonstrate how content knowledge is assessed during approval/renewal.
Accountability and Implementation Board and Institutions of Higher Education	Educator preparation	The term “mentor teacher” causes confusion given local education agencies use this term exclusively for teachers who mentor teachers during induction and provide professional development.	MSDE modified the language to identify a “clinical mentor teacher” to distinguish the role of a local education agency teacher who mentors teacher candidates during the practicum.
Institutions of Higher Education	Educator preparation	The regulations do not allow an individual to confer a degree if they don’t successfully complete the program.	MSDE clarified language to ensure programs have the option of conferring a degree when the student has not completed the requirements for licensure.

Stakeholder	Regulations	Feedback	MSDE Recommendation
Local Education Agencies	Educator Licensure	Licensure assessment requirements for program candidates are expensive and may be a barrier for candidates of color.	MSDE modified language to eliminate assessments not required by law and allow both paper/pencil and performance-based assessments to measure proficiency in reading instruction.
Accountability and Implementation Board and Local Education Agencies	Educator Licensure	Do not limit pathways for teacher candidates.	MSDE developed the In-District licensure pathway for career changers, as well as modified language to allow multiple measures of teaching ability for out-of-state candidates.
Accountability and Implementation Board and Local Education Agencies	Educator Licensure	The requirements for teachers assigned to teach more than two areas outside of their area of licensure are untenable and may lead to more shortages.	MSDE modified the language to allow teachers teaching more than two classes outside of their licensure area to demonstrate competency by providing an effective evaluation or completing content coursework.
Local Education Agencies	Educator Licensure	There are too many topic areas required for the renewal of a professional license.	MSDE combined topic areas to allow for broader choice when choosing professional learning experiences.

On December 1, 2022, and January 24, 2023, PSTEB and the SBOE respectively, granted permission to publish COMAR 13A.12.01-.07 and 13A.07.06 for public comment. The regulations were published in the Maryland Register on July 14, 2023. Additionally, the AIB provided feedback on August 14, 2023. MSDE reviewed public comments and the feedback provided by the AIB with PSTEB during their monthly meetings in October and November 2023. On

November 2, 2023, PSTEB voted to adopt COMAR 13A.12.01-.07 and COMAR 13A.07.06 without making any substantive changes.

COMAR 13A.12.01-.07 Educator Licensure

Executive Summary

MSDE is recommending that the repeal and replacement of Title 13A Subtitle 12 be completed in phases due to the extensive amount of regulatory language involved. Phase one focuses on amending the areas outlined in this document. Phase two will focus on the systematic review of all specialist and administrator licensure areas to determine what regulations require amendments. The process of amending specialists and administrator areas of licensure involves facilitating a workgroup comprised of various constituents representing experts in that field who will make recommendations to the MSDE. The proposed amendments in phase one of promulgation are centered around:

Structure of the chapters

The chapters were restructured to group requirements by type of educator. For example, the initial certification pathways, renewal requirements, and endorsement requirements for academic teachers are all found in Chapter 02. In addition, the distinction is made between requirements for academic teachers (Chapter 02) and professional technical and specialized areas of fine arts teachers (Chapter 03). The chapters of Title 13A Subtitle 12 are as follows:

Chapter 01 - General Provisions

Chapter 02 - Teachers

Chapter 03 - Professional and Technical Education and Specialized Areas for Fine Arts

Chapter 04 - Specialists

Chapter 05 - Administrators and Supervisors

Chapter 06 - Disciplinary Action and Denials

Chapter 07 - Professional Standards and Teacher Education Board

Transition to the term “license”

MSDE is recommending a transition from “certification” to “licensure” to distinguish the difference between State licensure and National Board Certification by the National Board for Professional Teaching Standards, which is required to advance on the career ladder established by the Blueprint for Maryland’s Future.

General provisions associated with licensure

Chapter 01 *General Provisions*, establishes requirements that pertain to all licensed educators, including application requirements, types and validity periods of licenses, and requirements to reinstate an expired license. This chapter

also includes a comprehensive set of definitions for the subtitle and identifies the personnel who are required to hold a license.

Types of Maryland licenses

The types of licenses recommended in the proposed regulations differ greatly from the current certificate structure. The proposed regulations establish a hierarchy of licenses; however, advancement is voluntary. A certificate holder may decide to renew a professional license without advancing to the next tier of licensure. It should be noted that these regulations do not prohibit a local education agency from requiring an advanced tier of licensure for employment. The proposed licenses and respective eligibility criteria are as follows:

Adjunct

- 1-year
- Renewable
- Not transferrable between districts
- Part-time position
- High school diploma or its equivalent
- Industry license, when applicable to the profession
- 5 years of satisfactory occupational experience in the field to be taught
- Issued only in teaching areas

Conditional

- 5-year or 3-year (special education only)
- non-renewable
- Bachelor's degree (unless in a Professional Technical Education area)
- Issued only in teaching areas

Resident Teacher

- 3-year
- Non-renewable
- Bachelor's degree
- Enrollment in Maryland approved alternative preparation program
- Issued only in teaching areas

Temporary Professional

- 2-year
- Non-renewable

- Out-of-State program completer or license holder who only needs MD certification assessments
- Issued only in teaching areas

Initial Professional

- 5-year
- Renewable
- Meets the requirements for one of the pathways to licensure

Professional

- 5-year
- Renewable
- Meets the requirements for one of the pathways to licensure
- Completes a Maryland induction program or has 3 years of effective performance

Advanced Professional

- 5-year
- Renewable
- Meets the requirements for one of the pathways to licensure
- Completes a Maryland induction program or verifies three years of effective performance
- Master's degree, 30-semester hour course of study, or National Board Certification

Montessori Professional (established in statute during the 2022 legislative session)

- Lifetime
- Bachelor's degree
- Valid credential from The American Montessori Society, The Association Montessori Internationale, or a program accredited by the Montessori Accreditation Council for Teacher Education
- Passing scores on an approved reading instruction assessment or attestation of proficiency through observation completed by an MSDE-approved assessor

Flexible pathways to teacher licensure

The proposed regulations establish new, flexible pathways to initial teacher licensure for those candidates prepared in Maryland, as well as maintained pathways for those who are prepared in another state or country. It is important to note that Maryland has historically imported approximately 50% of its teacher workforce. The proposed pathways to initial teacher licensure are as follows:

Maryland Educator Preparation Program approved under COMAR 13A.07.06 (traditional or alternative)

- Bachelor's degree or higher

- Passing scores as established by the State Superintendent of Schools on a content licensure test approved by the State Board of Education
- Passing scores as established by the State Superintendent of Schools on a reading instruction licensure test approved by the State Board of Education, or attestation of proficiency through observation completed by a Department-recognized assessor using a Department-provided observation tool
- Beginning on July 1, 2025, passing scores as established by the State Superintendent of Schools on a portfolio-based performance assessment approved by the State Board of Education.

In-District Training Program

- Employment with a Maryland LEA, nonpublic school approved under COMAR 13A.09.10, or State-operated school
- Possession of a conditional license in the subject area and at the grade level of the license sought
- Demonstration of content knowledge
 - Bachelor's degree or higher in a field related to the license area being sought; or
 - Bachelor's degree or higher in any field and a minimum of 24 semester hours of content coursework related to the license sought; or
 - Passing scores on an approved content assessment.
- Completion of a Maryland induction program that includes on-site supervision and coaching, ongoing instructional mentoring, and an effective rating on a summative evaluation at the end of the induction period
- Completion of a Department-approved sequence of pedagogical coursework
- A passing score on an approved reading instruction test or attestation of proficiency through observation completed by an MSDE-recognized assessor (only for candidates seeking licensure in the areas of elementary education, early childhood education, special education, and English to Speakers of Other Languages)
- Attestation from the district training program supervisor, designee, school principal, and coursework provider, that the candidate is prepared for licensure

Experienced Nonpublic School Teacher

- Bachelor's degree or higher related to the field of the license sought
- Verification of 5 years of effective teaching experience in the field and at the grade level of the license sought at a Maryland nonpublic school approved under COMAR 13A.09.09
- Beginning on July 1, 2025, a passing score as established by the State Superintendent of Schools on a portfolio-based performance assessment approved by the State Board of Education, or an effective rating on a year-end evaluation if employed in a Maryland LEA, nonpublic special education program, or State-operated school

- A passing score on an approved reading instruction test or attestation of proficiency through observation completed by an MSDE-recognized assessor (only for candidates seeking licensure in the areas of elementary education, early childhood education, special education, and English to Speakers of Other Languages)

Out-of-State Teacher Preparation Program

- Bachelor's degree or higher, or a U.S. equivalent of a foreign degree
- Complete a teacher preparation program, including a clinical internship, approved to lead to licensure in another state or a foreign country, in the license area being sought
- Beginning on July 1, 2025, a passing score as established by the State Superintendent of Schools on a portfolio-based performance assessment approved by the State Board of Education, or an effective rating on a year-end evaluation if employed in a Maryland LEA, nonpublic special education program, or State-operated school
- A passing score on an approved reading instruction test or attestation of proficiency through observation completed by an MSDE-recognized assessor (only for candidates seeking licensure in the areas of elementary education, early childhood education, special education, and English to Speakers of Other Languages)

Out-of-State License

- Bachelor's degree or higher, or a U.S. equivalent of a foreign degree
- Valid, professional license or certificate from another state or foreign country in the license area being sought
- Beginning on July 1, 2025, a passing score as established by the State Superintendent of Schools on a portfolio-based performance assessment approved by the State Board of Education, or an effective rating on a year-end evaluation if employed in a Maryland LEA, nonpublic special education program, or State-operated school
- A passing score on an approved reading instruction test or attestation of proficiency through observation completed by an MSDE-recognized assessor (only for candidates seeking licensure in the areas of elementary education, early childhood education, special education, and English to Speakers of Other Languages)

National Board Certification

- Bachelor's degree or higher (unless certified in Career and Technical Education)
- National Board Certificate issued from the National Board for Professional Teaching Standards, for which a comparable Maryland license exists

Occupational Experience (Professional and Technical Education/Specialized Areas for Fine Arts only)

- Verification of 3 years of occupational experience in the area to be taught that may include satisfactory post-secondary teaching experience in the area to be taught; and/or satisfactory occupational employment

- The applicant may substitute a Department-accepted, current industry-recognized credential for 1 year of the occupational experience requirement
- The applicant may substitute a bachelor's or associate's degree in the area to be taught for 1 year of the occupational experience requirement
- Completion of 12 credits of professional education coursework from an IHE or through Department-approved continuing professional development credits to include the following topics:
 - Planning, delivering and assessing instruction
 - Classroom management
 - Differentiating Instruction to accommodate students with special needs
 - Teaching literacy in the content area

Science of Reading

The proposed regulations require applicants and existing license holders to demonstrate proficiency in reading instruction aligned with the science of reading. Those individuals seeking licensure in early childhood education, elementary education, special education, and English for Speakers of Other Languages (ESOL) may demonstrate proficiency through a standardized assessment or an attestation by a Department-recognized assessor using a Department-approved observation measure. Additionally, existing certificate holders will be required to demonstrate proficiency at renewal beginning in 2025, which may be done in one of the following ways:

- Submission of a passing score on a reading instruction test approved by the State Board of Education
- Completion of coursework or professional learning approved by the Department
- Submission of attestation of proficiency through observation completed by a Department-recognized assessor
- Completion of training provided by the Department in the science of reading to fulfill the requirements of renewal

Once demonstrated, proficiency will be noted on the educator's license.

Rigorous renewal requirements

The SBOE and PSTEB requested that MSDE draft renewal regulations that ensure that Maryland teachers are engaging in professional learning that provides the strategies and resources required to implement instruction in a safe, inclusive environment for all types of students with differentiated needs. The new regulations require an Individual Professional Development Plan (IPDP) to be developed when a professional license is issued. This plan, approved by a supervisor or designee if the certificate holder is employed, requires the individual to complete professional development in specific areas:

- Content or pedagogy related to an area on the educator's license
- English as a Second Language, Sheltered English, or Bilingual Education

- Strategies for teaching students with disabilities, or differentiated instruction for students with diverse learning needs
- Culturally responsive teaching or diverse student identities in education

The regulations also introduce the concept of Professional Development Points (PDPs), 90 of which are required to renew a professional license every five years. A PDP is equal to one clock hour and may be earned in a variety of ways:

- College credit, earned or taught, at an accredited institution of higher education
- Continuing professional development (CPD) credits, earned or taught, approved by the Department
- Continuing education units (CEUs) from an accredited International Association for Continuing Education and Training provider or approved by another Maryland State agency for purposes of licensure
- Professional conference
- Curriculum development
- Publication of a book or article.
- Mentorship
- Micro-credentials
- Professional development activity approved by the Department, Maryland Local School System, State Agency, Maryland-approved nonpublic school, or another state department of education
- Occupational experience (Professional and Technical Education/Specialized Areas for Fine Arts only)
- National Board Certification

The expectation is that while the modality remains flexible, professional development must be rigorous, relevant, and include learning in specific areas that are critical to ensuring teachers are prepared to teach all Maryland students.

Disciplinary action

MSDE drew upon lessons learned over the years when updating this chapter. The following changes were incorporated to provide clarity and transparency, as well as strengthen the processes associated with taking disciplinary action against a license:

- Additional definitions to provide clarity
- Additional causes for disciplinary action to provide more comprehensive authority to protect Maryland students
- Description of the process of placing an alert on a record while an individual is being investigated
- Clarifications regarding timelines are embedded

- Description of the National Association of State Directors of Teacher Education and Certification Educator Identification Clearinghouse and the process of sharing information with this clearinghouse

Elimination of outdated language and/or antiquated requirements

There were many areas in the regulations that referred to outdated language such as “handicapped” that were updated. Additionally, MSDE identified outdated requirements in the Reading Specialist regulation. Given the age of this regulation, it is recommended that it be amended in phase one of promulgation to align requirements with the science of reading, then revisited in phase two after consulting with reading experts as would normally be done when revising a specialist regulation. Finally, two administrator areas were removed from the regulations: Resident Principal and Resident Assistant Principal, both of which were rarely issued during the past 10 years.

COMAR 13A.12.07.06 Programs for Professional Licensed Educators

Executive Summary

MSDE is recommending COMAR 13A.07.06 be repealed and replaced with language developed to establish the requirements and processes associated with the approval of educator preparation programs in Maryland. The following requirements are identified as critical updates that reflect the intent of the Blueprint for Maryland’s future and increase the rigor and accountability of educator preparation.

National Accreditation or State Approval

Education Article §11-208 of the Annotated Code of Maryland, adopted in 2017, allows a Maryland educator preparation program to choose between State approval and National Accreditation by an accreditor recognized jointly by the Maryland Higher Education Commission (MHEC) and MSDE. Accreditors must demonstrate alignment with the national standards used by Maryland to approve programs to apply for recognition. COMAR 13A.07.06 identifies the national standards with which national accreditors must align should they choose to be recognized by MHEC and MSDE. The law also requires the MSDE to pay the fees associated with national accreditation should a program opt for this approval pathway.

Entrance Requirements

The regulations establish a minimum 3.0 Grade Point Average (GPA) as an entry requirement for approved educator preparation programs. Candidates who do not have a 3.0 GPA may be enrolled if they pass an approved basic skills battery (e.g., Praxis Core Assessment). Additionally, programs may opt to waive the entrance requirements for up to 10% of an annual cohort if they provide those candidates the support required to meet the requirements for licensure upon exit from the program.

Science of Reading

Research-based literacy instruction aligned with the science of reading is integrated throughout the proposed regulations. Programs must provide a curriculum aligned to the science of reading, including phonemic awareness, phonics, vocabulary, fluency, and comprehension, and candidates must demonstrate competency in providing instruction using instructional strategies aligned to the science of reading to exit the program. Additionally,

beginning in the 2025-2026 school year, each approved program leading to certification in early childhood education, elementary education, special education, and ESOL must post on its website information describing its program to prepare teachers to teach reading using evidence-based practices in literacy programming and instruction aligned to the science of reading.

Rigorous Practicum

As required by the Blueprint for Maryland’s Future, each candidate must complete a teacher practicum as a requirement for completion of the program. The minimum length of the practicum is dependent on the type of program:

- Undergraduate programs must offer a practicum that is at least 100 days until July 1, 2025. Beginning in the 2025-2026 academic year, the minimum practicum for undergraduate programs must be equivalent to a full school year.
- Alternative programs must offer a practicum that is at least 100 days until July 1, 2025. Beginning in the 2025-2026 academic year, the minimum practicum for alternative programs must be equivalent to a full school year. As stated in the Blueprint for Maryland’s Future, there is an exception for programs approved before July 1, 2021, that provide diverse teachers in schools and local school systems that have high vacancies, turnover, and new teachers relative to other public schools in the State. These programs may continue to offer a 100-day practicum experience.
- Graduate programs must offer a practicum that is at least 100 days. Although they may increase the length of the practicum to a full school year, it is not required.

The proposed regulations establish requirements that ensure that candidates are supported during the practicum. The program and local education agency must collaborate to identify placements in a variety of school environments with diverse student populations, be organized using the career ladder once it is established by the Accountability and Implementation Board and provide a highly competent teacher mentor who has demonstrated the skills and knowledge needed to improve student performance and instill the skills, attitudes, values, and knowledge necessary for the next generation of teachers. Mentors are required to be compensated, must be provided release time, and will collaborate with the program to evaluate the candidate’s demonstration of competencies.

Candidate Competencies

The regulations identify the teacher competencies required to exit an educator preparation program. These competencies may be demonstrated in a variety of ways, including key assessments, observation, and performance assessments. There are four types of competencies established in the regulations. The following are examples of competencies for each category.

General

- Demonstrate evidence-based strategies and methods to improve student performance and one’s own professional practice
- Incorporate the knowledge of students’ physical, cognitive, emotional, social, and cultural development in the basis of effective teaching

- Create safe, inclusive learning environments for all students by effectively using trauma-informed instruction, implementing restorative practices and conflict de-escalation, and managing student behavior
- Analyze and use data derived from assessments to develop intervention plans aligned to the specific needs of individual students to remedy learning deficits
- Implement Response to Intervention, Universal Design for Learning, and Direct Instruction to differentiate instruction
- Implement Specially Designed Instruction to implement the Individualized Education Program for students with disabilities
- Effectively use high-quality instructional materials (including online) and adapt existing curriculum to make it stronger
- Collaborate effectively with colleagues, families, and social services agencies to support student achievement

Cultural Responsiveness

- Demonstrate the required knowledge and skills to support various racial, ethnic, linguistic, and socioeconomic groups through teaching that promotes social justice and equity, including restorative practices and practices to develop racial literacy
- Identify and assess how issues such as racism, sexism, socioeconomic status, immigration, and gender impact marginalized students, families, and educators on multiple levels by acknowledging one's own biases and inequitable actions and assessing how one's assumptions values, and biases may impact their responses to students and families and result in inequitable actions and practices
- Communicate high expectations for students of all identities including gender, race and ethnicity, language, socioeconomic status, and disability
- Incorporate a variety of culturally responsive instructional materials that represent and support learning for diverse populations of children and families
- Differentiate instruction with consideration for cultural, linguistic, and academic diversity
- Examine curriculum and learning materials for bias and deliver instruction with materials that center the perspectives and lived experiences of historically marginalized people
- Provide opportunities for families to be involved in their children's educational experience and integrate family and community-based funds of knowledge into teaching and learning

Literacy (secondary and specialty areas)

- Define, describe, explain, and analyze the developmental characteristics of adolescent literary learners, active independent readers, processes of making meaning, and motivation and engagement
- Define and distinguish features of diversity and interpret linguistic cultural differences among adolescent learners, and construct high quality learning environments that support individual and collaborative interaction and engagement

- Describe purposes and opportunities for reading, writing, and communicating within and across content areas and analyze types of new literacies and their uses for acquiring content knowledge and student understandings
- Identify professional and literacy standards and curricula for lesson development to plan and evaluate engaging instruction that supports all learners in meeting goals and intended outcomes
- Identify deficits in reading and develop a plan to address using strategies aligned to the science of reading to support appropriate interventions
- Employ evidence-based multi-modal instructional practices to develop and evaluate comprehension within content areas
- Explore professional dispositions and engage in critical self-reflection in order to construct a professional development plan as a content area literacy teacher

Literacy (early childhood, elementary, special education, and ESOL)

- Identify the component processes involved in reading and writing aligned to the science of reading (phonemic awareness, phonics, fluency, vocabulary, and comprehension) and describe how biological, cognitive, linguistic, and sociocultural factors may influence literacy development
- Identify characteristics that define evidence-based practices in literacy programming and instruction aligned to the science of reading and use those criteria to select print and multimedia resources to engage students as readers and writers
- Design speaking and listening opportunities that lead to more active, equitable, and academically oriented conversations for all students
- Identify the role of classroom literacy instruction aligned to the science of reading in a multi-tiered system of supports and work with colleagues to provide effective interventions for students who struggle as readers and writers
- Provide literacy instruction that reflects and is responsive to the diversity of the classroom community and promotes all students' cultural competence through inclusive and equitable literacy learning opportunities
- Select or design appropriate diagnostic assessments and use data from those assessments to determine areas of need, provide targeted instruction, collaborate with instructional specialists, monitor progress, and evaluate the effectiveness of literacy instruction
- Implement strategies that foster connections to students' homes and communities and provide opportunities for incorporating oral language variation

Math

- Apply content knowledge for each of the four essential topics: Numbers and Operations, Algebraic Thinking, Geometry and Measurement, and Data Analysis and Probability (elementary grades)
- Apply mathematics content knowledge for teaching within the candidate's area of licensure
- Recognize the coherent progression of mathematical concepts both within an age/range/grade/course and across an age/range/grade/course

- Identify the appropriate sequence of mathematical learning targets for both a unit of study and an individual lesson
- Construct collaborative and self-directed learning opportunities that reflect active student engagement in learning and a growth mindset
- Design rich mathematical tasks that help students develop the conceptual understanding, procedural skills, and the ability to apply the mathematics associated with learning targets
- Recognize productive struggles and unproductive struggles to promote perseverance and thinking flexibly

Accountability

The proposed regulations require educator preparation programs to demonstrate compliance with the regulatory requirements at the time of the initial application, annually by submitting data and a written report, and through a formalized program review that occurs every five years.

On an annual basis, each program will be required to submit data that is aggregated by race, ethnicity, and gender for the previous five years, including:

- Enrollment data, including candidate residence, and past and projected enrollment in each program
- Program completion rates
- Practicum placements by subject area, grade level, local education agency, and school
- Performance, including passing rates on Department-approved performance, content, and basic skills assessments
- Employment and retention of completers
- Candidate satisfaction survey results

A program review will be conducted every five years for those programs that choose State approval. Programs that opt for national accreditation will follow the review schedule of the accreditor and must submit a copy of the accreditation report to the MSDE. During the review, the provider must demonstrate that the educator preparation program(s) is aligned with the standards and competencies established in statute and regulation. This year-long process includes a self-study, an off-site evaluation, and meetings between the MSDE and provider before culminating in an onsite visit. The MSDE will determine the program's status based on the review, which may result in findings of noncompliance. A program that seriously fails to meet the compliance requirements or demonstrates a pattern of noncompliance may be placed on probation per the process established in the proposed regulations. If a program is not able to demonstrate progress toward meeting compliance requirements, the approval of that program may be revoked.

Action

MSDE is asking the SBOE to grant permission to adopt 13A.12.01-.07 *Educator Licensure* and 13A.07.06 *Programs for Professional Licensed Personnel*.

Attachments

COMAR 13A.12.01-.07 *Educator Licensure*

COMAR 13A.07.06 *Programs for Professional Licensed Personnel*

Title 13A

STATE BOARD OF EDUCATION

Subtitle 07 SCHOOL PERSONNEL

06 Programs for Professionally Licensed Personnel

Authority: Education Article, §§2-205, 6-120, 6-121, 6-704, and 11-208, Annotated Code of Maryland

.01 Purpose.

This chapter sets the standards that MSDE uses to issue an approval document to an entity that is responsible for governing and operating an educator preparation program, either traditional or alternative, for the training of educators in the knowledge, skills, and disposition required to understand and teach the Maryland Curriculum Frameworks as licensed educators in the State.

.02 Definitions.

A. In this chapter, the following terms have the meanings indicated.

B. Terms Defined.

(1) "Accreditation", also referred to as "national accreditation", means a teacher education program has met standards set by a national accrediting agency recognized by the Department and the Commission.

(2) "Action research" means a deliberate, solution-oriented investigation to enhance student achievement that is conducted by the teacher candidate, under the guidance of a mentor teacher and clinical faculty.

(3) "Alternative teacher preparation program" means a sequence of courses established by a county board and approved by the State Superintendent that leads to a participant receiving a resident teacher certificate issued by the Department and includes teaching assignments with supervision and mentoring by a qualified teacher.

(4) "Approval" means a program has met all requirements set by the Department.

(5) "Approval with conditions" means a program has met some, but not all, requirements set by the Department and may operate under certain circumstances.

(6) "Candidate" means an individual enrolled in an educator preparation program who is preparing for or serving in a position as an educator in schools that educate students in preschool through grade twelve.

(7) "Clinical experience" means guided, hands-on, practical applications and demonstrations of a candidate's professional knowledge and the application of theory through collaborative and facilitated learning, including in the practicum and in field-based assignments, tasks, activities, and assessments across a variety of settings.

(8) "Clinical supervisor" means an individual employed by the education preparation provider who oversees a candidate, is trained or experienced in the field in which the individual is supervising, and is trained to work with and provide feedback to candidates.

(9) "Commission" means the Maryland Higher Education Commission.

(10) "Completer" means the candidate has met exit requirements outlined in .08E of this regulation.

(11) "Department" means the Maryland State Department of Education.

(12) "Educator preparation program (program)" means either a traditional or alternative Maryland-approved sequence of courses and experiences required to train candidates to become licensed educators in a specific area.

(13) "Educator preparation provider (provider)" means an accredited college, university, or other post-secondary institution, public or private educational association, local school system, corporation or institution approved to operate traditional or alternative educator training programs in Maryland.

(14) "Entrance" means matriculation into a program.

(15) "Exit" means completion of a program.

(16) "Focused revisit" means the subsequent review by the Department of a program that holds the status of approved with conditions or probation.

(17) "Institution of higher education" means a place of postsecondary education that generally limits enrollment to graduates of secondary schools, and awards degrees at either the associate, baccalaureate, or graduate level.

(18) "Interstate Certification Compact (ICC)" means a legal agreement with other states to facilitate the certification of out-of-State teachers and other professional educational personnel as authorized by Education Article, Title 6, Subtitle 6, Annotated Code of Maryland, or as otherwise provided by law.

(19) "Local school system (LSS)" means a Maryland public local education agency a State-operated school, or a nonpublic school.

(20) "Maryland Teacher-Principal Evaluation" means an assessment framework for the performance of teachers administered annually by the local school system, a State-operated school, or a nonpublic school, and recommended by the State.

(21) "Mentor teacher" means a highly competent educator, trained and selected by the partner school, who will work to instill in the participant the skills, attitudes, values, and knowledge necessary for the next generation of teachers.

(22) “Partner school” means a local school system, nonpublic school, or nonpublic special education school that has a written partnership agreement with an institution of higher education or alternative teacher preparation program to provide a teacher training practicum for participants enrolled in a teacher preparation program at the institution of higher education or alternative teacher preparation program.

(23) “Practicum” means the clinical experiences in which candidates have an increased teaching responsibility under the guidance of a mentor teacher.

(24) “Probation” means a program has seriously failed to meet program requirements or has demonstrated a pattern of noncompliance.

(25) “Professional development” means a variety of specialized training, formal education, or advanced learning intended to help administrators, teachers, and other educators improve their professional knowledge, competence, skill, and effectiveness.

(26) “Traditional program” means a sequence of courses for educator preparation that:

(a) Is offered by a college or university leading to a degree that includes:

(i) General education and content coursework;

(ii) Professional coursework;

(iii) Clinical experiences; and

(iv) Demonstration of standards and competencies required to prepare educators for teaching students in the classroom environment; and

(b) On completion, makes candidates eligible for licensure in Maryland.

.03 Incorporation by Reference.

In this chapter, the following documents related to national standards are incorporated by reference:

A. Administrative or Supervisory Areas.

(1) [Professional Standards for Educational Leaders \(PSEL\), National Policy Board for Educational Administration \(NPBEA\), 2015.](#)

(2) [Program Recognition Standards: District Level, National Educational Leadership Preparation \(NELP\), 2018.](#)

(3) [ISTE Standards for Educational Leaders, International Society for Technology in Education \(ISTE\), 2018.](#)

B. Early Childhood/Elementary Areas.

(1) [Ensuring Quality in Early Childhood Education Professional Preparation Programs: NAEYC’s Early Childhood Higher Education Accreditation Standards, 2021.](#)

(2) [CAEP 2018 K-6 Elementary Teacher Preparation Standards, Council for the Accreditation of Educator Preparation \(CAEP\), 2018.](#)

C. English.

(1) [National Council of Teachers of English \(NCTE\) Standards for the Initial Preparation of Teachers of English Language Arts 7–12, 2021.](#)

(2) [Maryland College and Career Ready \(MCCR\) Standards for English Language Arts/Literacy, 2014.](#)

D. Mathematics.

(1) [Standards for Mathematical Practice, Common Core State Standards Initiative, 2010.](#)

(2) [Standards for Mathematics Teacher Preparation, National Council of Teachers of Math \(NCTM\), 2020.](#)

E. Middle School Areas.

(1) [Middle Level Teacher Preparation Standards with Rubrics and Supporting Explanations, Association for Middle Level Education \(AMLE\), 2022.](#)

F. Science.

(1) [Standards for Science Teacher Preparation, National Science Teachers Association \(NSTA\), 2020.](#)

(2) [Disciplinary Core Ideas \(DCI\) Arrangements of the Next Generation Science Standards, Next Generation Science Standards \(NGSS\), 2017.](#)

G. Special Education.

(1) [Initial Practice-Based Professional Preparation Standards for Special Educators, Council for Exceptional Children \(CEC\), 2020.](#)

(2) [Initial Practice-Based Standards for Early Interventionists/Early Childhood Special Educators, Council for Exceptional Children \(CEC\), 2020.](#)

(3) [Knowledge and Practice Standards for Teachers of Reading, International Dyslexia Association \(IDA\), 2018.](#)

H. Secondary Areas.

(1) [Standards for School-Based Agricultural Education Teacher Preparation Programs, American Association for Agricultural Education \(AAAE\), 2017.](#)

(2) [Business Teacher Education Curriculum Guide and Program Standards, National Business Education Association \(NBEA\), 2013.](#)

(3) [Standards for Computer Science Teachers, Computer Science Teachers Association \(CSTA\), 2020.](#)

(4) [Standards for Technological and Engineering Literacy: The Role of Technology and Engineering in STEM Education, International Technology and Engineering Educators Association \(ITEEA\), 2021.](#)

(5) [National Standards for Teachers of Family And Consumer Sciences, National Association of State Administrators of Family and Consumer Sciences \(NASAFACS\), 2018.](#)

(6) [National Core Arts Standards: Theatre, National Coalition for Core Arts Standards, 2014.](#)

(7) [National Standards for the Preparation of Social Studies Teachers, National Council for Social Studies \(NCSS\), 2017.](#)

(8) [Handbook, National Association of Schools of Theatre \(NAST\), 2022—2023.](#)

I. Specialist Areas.

(1) [NAGC — CEC Teacher Preparation Standards in Gifted and Talented Education, National Association for Gifted Children \(NAGC\) — Gifted and Talented Specialist: Council for Exceptional Children \(CEC\); The Association for the Gifted \(TAG\), 2013.](#)

(2) [Introduction to the 2016 CACREP Standards, Council for Accreditation of Counseling & Related Educational Programs \(CACREP\), 2016.](#)

(3) [ASCA Standards, American School Counselor Association \(ASCA\), 2019.](#)

(4) [Standards Framework for Learners, American Association of School Librarians \(AASL\), 2018.](#)

(5) [Standards for Accreditation of Master's Programs in Library and Information Studies, Adopted by the Council of the American Library Association \(ALA\), 2015.](#)

(6) [Standards for the Preparation of Literacy Professionals, International Literacy Association \(ILA\) Standards for the Preparation of Literacy Professional, 2017.](#)

(7) [Standards for Graduate Preparation of School Psychologists, National Association of School Psychologists \(NASP\), 2010.](#)

(8) [Standards for School Social Work Services, National Association of Social Workers \(NASW\), 2012.](#)

J. Specialty Areas (PreK-12).

(1) [ACTFL/CAEP Program Standards for the Preparation of Foreign Language Teachers, American Council on the Teaching of Foreign Languages \(ACTFL\)/ Council for the Accreditation of Educator Preparation \(CAEP\), 2013.](#)

(2) [Standards for Learning American Sign Language: A Project of the American Sign Language Teachers Association, American Sign Language Teachers Association \(ASLTA\), 2018.](#)

(3) [Standards for Art Teacher Preparation, National Art Education Association \(NAEA\), 2009.](#)

(4) [National Association of Schools of Music \(NASM\), Handbook 2022—2023.](#)

(5) [National Core Arts Standards: Dance, National Coalition for Core Arts Standards, 2014.](#)

(6) [National Core Arts Standards: Music, National Coalition for Core Arts Standards, 2014.](#)

(7) [National Core Arts Standards: Visual Arts, National Coalition for Core Arts Standards, 2014.](#)

(8) [SOPHE 2019 Health Education Teacher Preparation Standards, Society for Public Health Education \(SOPHE\), 2019.](#)

(9) [National Standards for Initial Physical Education Teacher Education, Society of Health and Physical Educators \(SHAPE\), 2018.](#)

(10) [Standards for Initial TESOL Pre-K–12 Teacher Preparation Programs, Teaching English to Speakers of Other Languages \(TESOL\), 2018.](#)

(11) [WIDA's English Language Development Standards, Kindergarten-Grade 12, WIDA, 2020.](#)

K. General Teaching.

(1) [Standards for Educators, International Society for Technology in Education \(ISTE\), 2017.](#)

(2) [Model Core Teaching Standards and Learning Progressions for Teachers 1.0, Interstate Teacher Assessment and Support Consortium \(InTASC\), 2013.](#)

(3) [Model Code of Ethics for Educators \(MCEE\), National Association of State Directors of Teacher Education and Certification, 2021.](#)

(4) [Social Justice Standards: The Teaching Tolerance Anti-Bias Framework, Teaching Tolerance, A Project of the Southern Poverty Law Center, 2018.](#)

.04 State Consent to Offer Programs.

A. An individual, public or private educational association, corporation, or institution of higher education may not offer an educator preparation program without obtaining the permission of the Commission and the Department by meeting the requirements of this chapter.

B. The Department may allow a provider to operate an educator preparation program if:

(1) The Commission has granted a Maryland institution preparing educators approval to operate in Maryland as applicable; and

(2) The provider obtains and continues to hold accreditation from a national accreditation organization recognized by the Department and the Commission, or meets the approval requirements as outlined in this chapter.

.05 National Accreditation.

A. In this regulation, “national accreditation” means teacher education accreditation by an accrediting agency recognized by the Department and the Commission.

B. A provider does not need to meet State approval standards if it holds and maintains accreditation from a national accrediting agency recognized by the Department and the Commission.

C. A provider shall notify the Department when it applies to a national accreditation organization recognized by the Department and the Commission.

D. A provider shall operate its Program in a manner that is consistent with the requirements of the national accrediting agency.

E. A provider shall submit to the Department proof of accreditation with supporting documentation within 30 calendar days after receiving it.

F. A provider shall notify the Department within 15 calendar days of any change in a program's accreditation status.

G. Programs that have chosen national accreditation may be reviewed by their accrediting organization at the request of the Department.

H. The Department may investigate complaints regarding any aspect of a program separate from any review conducted by the national accrediting agency.

I. A provider that holds national accreditation shall inform the Department in writing at least 90 calendar days before a program stops operating and provide an exit plan for current students that includes notification to those students.

J. A provider of a program that holds national accreditation shall submit reporting requirements outlined in Regulation .10A(5) of this chapter.

K. The Department shall pay:

(1) Any fee that a national accrediting agency charges an institution of higher education in connection with the accreditation process;

(2) Any training fee that a national accrediting agency charges a State representative who serves with a review team of an accrediting agency in conjunction with an accreditation visit to an institution of higher education in the State; and

(3) One-half of the expenses incurred by an institution of higher education in connection with the accreditation visit of a review team of a national accrediting agency.

.06 Application for State Approval.

A. Application for State Approval for Traditional and Alternative Programs.

(1) A provider shall submit an application for new program approval to the Department that includes the following:

(a) A description of the program and other administrative information, including the plan for implementing Department-mandated program components as defined in Regulation .07 of this chapter;

(b) A plan to recruit racially and ethnically diverse candidates; and

(c) Documentation that the program is aligned to national content standards, or documentation of the process required in Regulation .07C when national content standards are not available, including:

(i) A needs assessment demonstrating the demand for program completers in the employment market and demand by potential candidates, which may be met by documentation provided to the Commission;

(ii) The curriculum for the program and a course sequence chart including syllabi for any new courses;

(iii) Descriptions of the expected outcomes of the programs and how those outcomes will be assessed;

(iv) Key assessments in the program, using rubrics aligned to national content standards and Maryland-approved PK-12 competencies;

(v) Vitae for all faculty administering or delivering instruction in the program; and

(vi) Descriptions of materials, media, and resources available for the program, and how technology is integrated into the curriculum or program.

(2) A provider shall notify the Department not later than 6 months before applying for State approval.

B. The Department shall issue a letter of approval to the provider to begin operation of a program or programs when the provider has met the requirements of this chapter.

C. The Department shall include the following in the approval letter:

(1) Name of the provider;

(2) Location of the provider;

(3) List of programs leading to certification;

(4) Description of degree or degrees, and certificates awarded on completion of the program; and

(5) Length of approval.

D. A provider shall operate its program in a manner that is consistent with the specifications in its approval letter and the requirements of this chapter.

E. If a provider plans a change in operation that is inconsistent with the specifications in its approval letter, the provider shall notify the Department in writing not later than 6 months before the intended change and include a letter from the Commission indicating approval of the change, if required by the Commission.

F. A provider may not implement a change in the operation of a program until the Department has been notified and has determined whether a change to the approval letter is required.

G. The Department may not approve a change in an approval letter under any of the following circumstances:

(1) The program status is approval with conditions, unless the provider provides sufficient evidence that the change is necessary to meet all approval requirements;

(2) The program is on probation;

(3) The program has not filed its annual report with the Department;

(4) The Department is investigating a written complaint alleging that the provider's program is in violation of one or more regulations under this chapter, unless the change is necessary to bring the program into compliance with this chapter; or

(5) The Department is implementing procedures and sanctions as specified in Regulation .11 of this chapter.

H. The Department shall notify a provider that a requested change may not be implemented in writing within 30 days of the date of the written request.

I. A provider shall inform the Department in writing not later than 90 calendar days before a program stops operating and provide an exit plan for current students that includes notification to those students.

J. The approval letter is void if:

(1) The provider stops operating a program; or

(2) The State Superintendent issues a final order requiring the program to stop operations.

.07 State Program Approval Process.

A. Requirements for Traditional and Alternative Programs.

(1) A provider may seek approval for a new program, or a new specialization in a currently operating program area, if the documentation submitted contains sufficient justification to warrant the program or new specialization, and has been approved by the Commission.

(2) Where a provider seeks first-time approval for a program, the Department may conduct annual monitoring and a full review of the program or programs within the first 2 years of operation and may also conduct an on-site review if considered necessary by the Department to confirm information in the application.

(3) The Department shall approve or reject the proposal for a new program and notify representatives of the provider, in writing, of the decision.

(4) A new program may not admit candidates to the program until the Department has provided approval.

B. Special Requirements for Alternative Programs.

(1) In addition to meeting the requirements found in §A of this regulation, a provider of an alternative program shall provide at least 4 weeks of professional development before the candidate assumes full responsibility of the classroom.

(2) The provider shall ensure this professional development includes, but is not limited to, pre-employment training, initial coursework, pedagogy, and pre-practicum experiences.

C. Program Approval Process Where No National Content Standards Are Available.

(1) As part of the approval process for proposed programs for which there are no national content standards, the Department shall review the program application, and may also conduct an on-site review if considered necessary by the Department to confirm information in the application.

(2) A program approved under this section shall complete all requirements in §A to receive program approval.

(3) At least 6 months before requesting program approval, a provider shall notify the Department of its intent to initiate the review process for a program for which there are no national content standards.

(4) At least 6 months before the approval is requested, the provider shall submit the application for approval to the Department.

(5) The provider shall ensure this application includes:

(a) A description of the proposed program;

(b) A detailed description and outline of proposed program content and coursework; and

(c) Identification of national content standards most closely related and relevant to the proposed program.

.08 State Program Approval Requirements.

A. Entry Requirements for Teacher Preparation Programs.

(1) A provider of a traditional program shall require candidates to have a grade point average (GPA) of at least 3.0 on a 4.0 scale during the most recent 2 years of the candidate's post-secondary education or demonstrate mastery of general knowledge by providing evidence of a qualifying score, as established by the State Superintendent of Schools and as approved by the State Board of Education (SBOE), on a basic skills assessment.

(2) A provider of an alternative program shall require candidates to submit:

(a) A GPA of at least 3.0 on a 4.0 scale at the post-secondary level, or demonstrate mastery of general knowledge by providing evidence of a qualifying score, as established by the State Superintendent of Schools and as approved by the SBOE, on a basic skills assessment; and

(b) Evidence of one of the following:

(i) A conferred bachelor's degree or higher with a major related to the program licensure area;

(ii) A conferred bachelor's degree or higher with a minimum of 24 semester hours of credit related to the licensure area; or

(iii) A conferred bachelor's degree or higher and evidence of a qualifying score on an approved content assessment, as established by the State Superintendent of Schools and as approved by the SBOE.

B. Waiver of Entry Requirements.

(1) A provider of a program may waive the entrance requirement for up to 10 percent of the candidates admitted in an annual cohort.

(2) A provider of a program shall implement strategies to ensure that candidates admitted under a waiver receive assistance to successfully demonstrate the required standards and competencies and meet requirements for licensure on exit from the program.

C. Standards and Competencies.

(1) A provider shall ensure that its teacher preparation programs provide the following for all candidates:

(a) Instruction and experiences in the core academic subjects that the teacher will be teaching, aligned with Maryland-recognized national content and pedagogy standards listed under Regulation .03A of this chapter;

(b) Instruction and experiences aligned with Department-approved competencies under Regulations .12—.15 of this chapter;

(c) Instruction in the Department-approved Model Code of Ethics for Educators;

(d) Instruction in teaching in high poverty, culturally diverse, and linguistically diverse schools under Regulation .15 of this chapter; and

(e) Instruction in research-based literacy instruction aligned to the science of reading for the grade level the individual will be teaching.

(2) A provider of a teacher preparation program leading to licensure in early childhood education, elementary education, English as a Second Language, and special education shall:

(a) Provide coursework demonstrating coverage of research-based literacy instruction aligned to the science of reading including phonemic awareness, phonics, vocabulary, fluency, and comprehension;

(b) Use high-quality curricula and materials that accurately detail the principles of scientifically-based reading practices;

(c) Provide opportunities for candidates to demonstrate mastery of reading instruction through in-class assignments, tests, and instructional practice; and

(d) Prepare candidates to interpret reading assessment data to identify students with reading difficulties and inform instruction.

(3) A provider shall ensure that programs preparing candidates for licensure in early childhood and elementary education provide content instruction in each of the following:

(a) English language arts;

(b) Social studies;

(c) Math; and

(d) Science.

(4) Programs for Specialists. The Department shall approve specialists programs according to the national standards listed in Regulation .03A of this chapter.

(5) Programs for Administrators.

(a) The Department shall approve administrator programs according to the national standards listed in Regulation .03A of this chapter.

(b) A provider of a program that offers courses in school administration shall:

(i) Develop a method for evaluating the potential of candidates to be effective school leaders;

(ii) Develop a curriculum to enable candidates to organize and manage both schools and highly skilled professionals in a professional work environment, and achieve effective peer observations and effective evaluations of other personnel;

(iii) Include clinical experiences and assessments that measure competencies established in the program curriculum; and

(iv) Include instruction in research-based literacy instruction aligned to the science of reading.

D. Clinical Experiences.

(1) Each participant in an undergraduate, graduate, or alternative teacher preparation program shall complete a teacher training practicum as a requirement for program completion.

(2) A provider shall ensure that a teacher training program incorporates classroom observations in which the candidate is observed in different school settings at the beginning of the program to assist in determining if the candidate has the aptitude and temperament for teaching.

(3) A teacher training practicum may be completed consecutively or over the course of the program.

(4) Before July 1, 2025, a provider shall ensure that a teacher preparation program has a required practicum of a minimum of 100 days.

(5) Minimum Required Practicum.

(a) Beginning on July 1, 2025, a provider shall ensure that:

(i) An undergraduate teacher preparation program has a required practicum equivalent to a full school year;

(ii) A graduate teacher preparation program has a required practicum of a minimum of 100 days; and

(iii) An alternative teacher preparation program has a required practicum equivalent to a full school year.

(b) Exception. Where an alternative teacher preparation program operating in Maryland on or before July 1, 2021 provides effective and diverse teachers in schools and local school systems, as approved by the State Superintendent, and has high rates of teacher vacancies, teacher turnover, and new teachers relative to other public schools in Maryland, a provider shall ensure that this program has a required practicum of a minimum of 100 days.

(6) A provider shall ensure collaboration with mentor teachers of a partner school to evaluate participants in a teacher training practicum and ensure each participant demonstrates the competencies required of licensed teachers.

(7) Special Requirements for Alternative Teacher Preparation Programs. A provider shall ensure that a teacher training practicum in an alternative teacher preparation program includes, at a minimum, the following content:

(a) Preparing lesson plans;

(b) Teaching;

(c) Debriefing;

(d) Observation of a class of students to which the participant is assigned as a student teacher; and

(e) 40 hours of teaching during class periods.

(8) A provider shall ensure that a program leading to licensure in an area of teaching includes a practicum experience in a partner school and:

(a) Is located in a Maryland public school, nonpublic school, or an out-of-State school with the permission of the State Superintendent;

(b) Is aligned with program curricula that encompass the area, subject, or category of licensure being sought by candidates, including opportunities to provide reading instruction for those candidates enrolled in early childhood, elementary, special education, and ESOL programs;

(c) Provides candidates on-site supervision by a mentor teacher and ongoing support by a clinical supervisor from the provider, including:

(i) Documented observations;

(ii) Collaboration between clinical supervisors and mentor teachers to evaluate candidates for demonstration of required competencies;

(iii) Observations and evaluations of candidates, aligned to a Department-approved educator evaluation system; and

(iv) Feedback, placement, remediation, or supports, informed by candidate evaluation; and

(d) Ensures candidates are responsible for the instruction and classroom management of a roster of students for a minimum of 150 hours during the practicum.

(9) A provider shall ensure that a program for administrators includes supervised clinical experience totaling a minimum of 240 hours distributed within the program to include observations and evaluations of candidates aligned to a Department-approved administrator evaluation system.

(10) A provider shall ensure that a program for specialists includes a supervised clinical experience in the specialty area being pursued.

E. Exit Requirements.

(1) A provider shall establish exit requirements for programs that:

(a) Demonstrate successful completion of required coursework that is based on Department-recognized national content standards and Department-approved competencies;

(b) Demonstrate successful completion of the clinical experience outlined in Regulation .08D of this chapter; and

(c) Beginning on July 1, 2025, obtain a qualifying score on a nationally recognized and nationally scored portfolio-based assessment of teaching ability, as established by the State Superintendent of Schools and as approved by the State Board of Education, in teaching areas only.

(2) Candidates who complete an approved program in the State who passed an approved portfolio-based assessment will not be required to take the assessment more than one time.

F. Credit Requirements.

(1) A provider shall ensure that a program leading to a bachelor's degree is a 4-year program and award 120 credits, unless otherwise permitted by law.

(2) A provider may expand the program by no more than 12 semester hours of credit or an additional semester only with the permission of the Department and the Commission.

.09 Clinical Experience Placements.

A. A partner school and a provider shall establish a teacher training practicum through a written partnership agreement, as follows:

(1) The provider of a program shall prioritize selecting partner schools within its same community;

(2) The provider of a program and a partner school shall seek to provide teacher training placements in a variety of school environments with diverse student populations that provide participants with the same kind of experiences as teachers employed in the State; and

(3) The instructional program and work organization of a partner school located in a local school system shall reflect the career ladder once the Accountability and Implementation Board determines that the career ladder system is well established throughout the State.

B. A clinical mentor teacher shall:

(1) Be a highly competent teacher demonstrated by evidence of impacting student achievement;

(2) Be trained and selected by the partner school;

(3) Hold a professional Maryland educator license;

(4) Have the skills and knowledge needed to mentor teacher training practicum participants and to instill the skills, attitudes, values, and knowledge necessary for the next generation of teachers;

(5) Provide opportunities for teacher training practicum participants in guided, hands-on, practical applications and demonstrations of a candidate's professional knowledge while applying educational theory through collaborative and facilitated learning tasks, activities, and assessments

(6) Have teaching and release time per the implementation of the county board approved career ladder to mentor candidates and lead workshops and demonstrations at the school level; and

(7) Will collaborate with the educator preparation program to evaluate participants in a teacher training practicum to ensure each participant demonstrates the competencies required of certified teachers; and

(8) Be selected using the following criteria:

(a) From the career ladder system, as applicable, when the Accountability and Implementation Board determines that the career ladder system is well established throughout the State;

(b) Until the Accountability and Implementation Board makes a determination that the career ladder is well established, meet the requirements of B(1)-(7) of this regulation; and

(c) A partner school may select a clinical mentor who is not on the career ladder if the partner school can demonstrate the need to justify the selection.

C. Program Collaboration with Clinical Experience Placements.

- (1) *The provider of the program shall collaborate with the partner school to provide the mentor teacher:*
 - (a) *Initial training on best practices in coaching, mentoring, and reflective strategies; and*
 - (b) *Additional professional development to support mentor teachers.*
- (2) *The provider of the program shall collaborate with mentor teachers to ensure teacher candidates demonstrate the teacher competencies established in Regulations .12—.15 of this chapter.*

D. Partner School Requirements.

- (1) *A partner school shall:*
 - (a) *Assist in finding teaching training practicum placements, to ensure:*
 - (i) *A well-rounded clinical experience based on student population and geographic location;*
 - (ii) *Exposure to distinguished instructional practices; and*
 - (iii) *Placement with a mentor teacher who meets the requirements outlined in §B of this regulation, and is professionally licensed in the area in which the candidate is placed; and*
 - (b) *Actively collaborate with programs to ensure mentoring and growth of teacher candidates.*
- (2) *Compensation of Mentor Teachers.*
 - (a) *Partner schools shall compensate mentor teachers who supervise participants in a teacher training practicum.*
 - (b) *When the career ladder system is well established throughout the State, as determined by the Accountability and Implementation Board, the compensation of mentor teachers will be according to the career ladder system.*

E. Action Research.

- (1) *A provider shall ensure that all programs require teacher candidates to conduct action research during the practicum.*
- (2) *Candidates shall present findings to the partner school and program.*
- (3) *Candidates shall ensure these findings include the ongoing cycle of problem identification, data collection, reflection, analysis, and lessons learned for the next cycle.*

.10 State Program Reporting.

A. Compliance with Program Requirements.

- (1) *A provider shall provide evidence of adherence to program requirements as outlined in this regulation.*
- (2) *If a provider submits annual reporting to a national accreditation agency recognized by the Department and the Commission, the provider shall submit a copy of the annual report to the Department within 30 calendar days.*
- (3) *A provider shall submit data and annual reports to the Department demonstrating each program's compliance with requirements.*
- (4) *A provider shall ensure the annual reports include documentation of compliance with the following measures:*
 - (a) *Entry requirements as stated in Regulation .08A of this chapter;*
 - (b) *Clinical experience requirements as stated in Regulation .08D of this chapter;*
 - (c) *Standards and competencies requirements as stated in Regulation .08C of this chapter;*
 - (d) *Exit requirements as stated in Regulation .08E of this chapter, including candidate passing rates on performance assessments, as well as rate of program completion, and attrition data;*
 - (e) *Candidate evaluation requirements as stated in Regulation .08D(8)(c) of this chapter, including documentation of evaluation processes and remediation policies as defined by the program; and*
 - (f) *The process by which the provider uses data to continuously improve the program, including, but not limited to, the recruitment and support of a racially and ethnically diverse pool of candidates.*
- (5) *A provider shall compile and report data to the Department for each graduating cohort at the individual level, including race, ethnicity, and gender, for the most recent 5 years of program cohorts, on a selection of Department-identified metrics that may include, at a minimum:*
 - (a) *Program completion rates, including number and demographics of completers, non-completers, and degrees granted;*
 - (b) *Placement in partner schools by subject area, grade level, LSS employer, and school;*
 - (c) *Performance, including passing rates on Department-approved performance, content, and basic skills assessments;*
 - (d) *Enrollment data, including candidate residence, and past and projected enrollment in each program;*
 - (e) *Employment of graduates/completers;*
 - (f) *Retention of program completers through the first 5 years of employment; and*
 - (g) *Candidate satisfaction survey.*

B. The Department will distribute to providers a copy of the Maryland Curriculum Frameworks for prekindergarten through 12th grade on an annual basis to ensure content, composition, and expectations of teachers are current.

.11 State Program Renewal, Oversight, and Revocation.

A. Program Review.

- (1) *The Department shall review programs every 5 years.*
- (2) *The Department shall approve programs that meet its requirements and standards for 5 years.*
- (3) *Programs that fail to meet all the requirements and standards addressed in this chapter may be approved with conditions or placed on probation.*
- (4) *Program Extensions.*
 - (a) *A provider may request an extension of the Department's 5-year review.*

(b) A provider shall submit this request in writing at least 180 calendar days before the end of the program's 5-year approval.

(c) The Department may grant up to a 1-year extension based on documentation submitted to justify the extension.

(5) The Department may monitor or conduct an interim review of a program at any time.

(a) Where this interim review reveals that a program has seriously failed to meet the standards and benchmarks or reporting or compliance requirements, or has demonstrated a pattern of noncompliance, the program may be placed on probation under §C of this regulation.

(b) If after the 1-year probation, a program fails to make satisfactory progress toward meeting program standards, reporting requirements, or compliance requirements, the Department may revoke its approval under §D of this regulation.

(6) Beginning in the 2025-2026 school year, each approved educator preparation program leading to certification in early childhood education, elementary education, special education, and ESOL, shall post on its website information describing its program to prepare teachers to teach reading using evidence-based practices in literacy programming and instruction aligned to the science of reading.

B. Approval with Conditions.

(1) If the approved program fails to meet all of the standards and competencies, reporting, or compliance requirements, it may be approved with conditions for a period of 2 years.

(2) The Department shall conduct a focused review of a program approved with conditions within 2 years of the original review.

(3) The Department may extend a program's approval with conditions for good cause beyond the original 24-month period.

(4) Programs may continue to accept candidates for entry while approved with conditions.

(5) Approval with conditions shall last 2 years unless, through its annual reports, the program supplies sufficient evidence to meet program approval requirements, after which it may be removed from approval with conditions after 1 year, granted approval, and returned to a 5-year review cycle.

(6) A program approved with conditions shall continue to provide all annual reporting.

(7) If after 2 years a program has not made satisfactory progress toward meeting Department requirements and national standards, reporting requirements, or compliance requirements, the program may be placed on probation or revoked.

C. Probation.

(1) Programs that have seriously failed to meet the standards and benchmarks or reporting or compliance requirements, or have demonstrated a pattern of noncompliance, may be placed on probation.

(2) Programs that do not submit data or required reports to the Department, or who lose national accreditation status by revocation or by expiration, may be placed on probation status or may face immediate revocation of Department approval.

(3) The Department may conduct a full review within 1 year of the last focused revisit for a program on probation unless, through annual reporting requirements, the program supplies sufficient evidence to meet program approval requirements.

(4) Programs may not accept candidates for entry while on probation.

(5) A program on probation shall continue to provide all annual reporting to the Department.

(6) Within 30 calendar days of the notification of probation, the provider shall notify each candidate individually in writing of the probation of the program, explain what probation means, and provide documentation of the notification to the Department.

(7) The Department shall monitor program progress towards meeting the Department requirements and national standards for the program throughout the probationary period, including review of required reports and monitoring visits as considered necessary.

(8) If a program supplies evidence of meeting all program requirements, the Department may remove it from probation.

(9) The Department may request an annual follow-up report with an annual re-visit for institutions removed from probation.

(10) If after the 1-year probation a program has not made satisfactory progress toward meeting program standards, reporting requirements, or compliance requirements, the Department may revoke its approval.

D. Revocation.

(1) The Department may revoke its approval if a program fails to meet the standards, reporting or compliance requirements set forth by this chapter.

(2) The Department shall notify the provider in writing of a decision to revoke approval.

(3) On provision of the notification, the provider shall stop operating the revoked program.

(4) A revoked program may not recruit or accept new candidates.

(5) Within 30 calendar days of the notification of revocation, the provider shall notify each candidate individually, in writing, of the revocation of program approval, explain what revocation means, and provide documentation of the notification to the Department.

(6) Candidates enrolled in the revoked program who have accumulated enough credits to be on track for program completion within the current academic year may exit.

(7) A provider shall wait 2 years after revocation of a program before it may apply to the Department for approval of a program that is substantively the same as the one revoked.

E. Appeal.

(1) A provider may request a hearing to challenge the revocation if the provider files a written request with the State Superintendent within 20 calendar days of receipt of the notice of revocation.

(2) *The State Superintendent shall promptly refer the case to the Office of Administrative Hearings.*

F. Hearing Procedures.

(1) *The hearing procedures for appeals referred to the Office of Administrative Hearings are in accordance with the Administrative Procedure Act, State Government Article, §§10-201—10-226, Annotated Code of Maryland, and with COMAR 28.02.*

(2) *The Office of Administrative Hearings shall prepare an official case record as provided in COMAR 28.02.01.22.*

(3) *The administrative law judge shall submit in writing to the State Superintendent a proposed decision containing findings of fact, conclusions of law, and recommendations, and distribute a copy of the proposed decision to the parties.*

(4) *A party objecting to the administrative law judge's proposed decision may file exceptions with the State Superintendent within 15 calendar days from the date of the decision. A party may respond to the exceptions within 15 calendar days of the date of the exceptions.*

(5) *If exceptions are filed, any party may request an opportunity for oral argument before the State Superintendent before a final decision is made. Each side may present no more than 15 minutes of oral argument before the State Superintendent.*

(6) *The State Superintendent shall make a final decision in writing containing findings of fact and conclusions of law.*

(7) *A provider may seek judicial review of a State Superintendent's determination under this regulation as provided by the Administrative Procedure Act, State Government Article, §10-222, Annotated Code of Maryland.*

.12 Teacher Preparation Competencies: General Competencies.

A. Purpose.

(1) *The general teacher preparation competencies apply to teacher candidates across all content areas and grade levels, to determine readiness to enter the profession.*

(2) *The teacher candidate shall demonstrate essential knowledge and skills of general competencies that align with current expectations for teacher candidates to exit a program.*

B. Required General Competencies. The teacher candidate shall:

(1) *Use evidence-based research strategies, learning theories, and methods to help improve student performance;*

(2) *Use inquiry skills and methods regularly to collect meaningful data and improve the candidate's professional practice;*

(3) *Incorporate personal reflection, professionals' feedback, best practice, and expert opinion to improve the candidate's professional practice;*

(4) *Demonstrate that knowledge of the learner's physical, cognitive, emotional, social, and cultural development is the basis of effective teaching of the following students:*

(a) *Students from different racial, ethnic, and socioeconomic backgrounds;*

(b) *Students for whom English is not their primary language;*

Students with different learning abilities; and

(c) *Students with social and emotional needs;*

(5) *Create, build, and sustain a safe, inclusive learning environment by effectively:*

(a) *Using trauma-informed instruction and other approaches to meet social and emotional needs;*

(b) *Implementing restorative practices;*

(c) *Using active listening, conflict de-escalation to include bullying, and other strategies; and*

(d) *Managing student behavior;*

(6) *Apply multiple, valid assessment approaches, both formal and informal, modifying when appropriate, that address a variety of developmental needs, conceptual abilities, curriculum outcomes, and school goals;*

(7) *Develop action research that advances the candidate's knowledge base, promotes equity, and addresses an academic need;*

(8) *Collaborate effectively with colleagues, families, school professionals, businesses, and social services agencies to support student development and student achievement;*

(9) *Apply instructional supports including a 504 Plan and an individualized education plan, to support a student with disabilities by providing developmentally appropriate access to age-level or grade-level instruction, individually and in collaboration with colleagues;*

(10) *Evaluate student behaviors and unique learning needs in the adaption of various learning environments, such as physical arrangement, student grouping, instructional intensity, pacing, and embedded assistive technology supports;*

(11) *Use assistive technologies ranging from low-tech to high-tech devices or equipment, materials, and resources to educate individuals whose disabilities interfere with written or verbal communication;*

(12) *Analyze and use data derived from assessments to develop intervention plans aligned to the specific needs of individual students to remedy learning deficits;*

(13) *Implement Response to Intervention (RtI), Universal Design for Learning (UDL), and Direct Instruction (DI) to differentiate instruction; and*

(14) *Implement Specially Designed Instruction (SDI) to implement the Individualized Education Program for students with disabilities.*

(15) *Effectively use high quality instructional materials (including online) and adapt existing curriculum to make it stronger using standards-aligned tools, including the ability to use digital resources and computer technology.*

.13 Teacher Preparation Competencies: Literacy Competencies.

A. Literacy Competencies for Secondary and PreK-12 Teaching Areas. Teacher candidates completing programs that lead to licensure in secondary and PreK-12 content areas shall demonstrate an understanding of the following competencies:

- (1) *The Learner and Learning. The teacher candidate shall:*
- (a) Define, describe, explain, and analyze the developmental characteristics of adolescent literary learners, active independent readers, processes of making meaning, and motivation and engagement;
 - (b) Interpret, synthesize, and apply learning of active independent readers, processes of making meaning, and motivation and engagement to specific content area instruction.
 - (c) Define and distinguish features of diversity and interpret linguistic cultural differences among adolescent learners;
 - (d) Examine, evaluate, and apply learning of inclusive content area literacy environment and instruction to close achievement gaps;
 - (e) Describe the characteristics of a high quality learning environment; and
 - (f) Construct high quality learning environments that support individual and collaborative interaction and engagement.
- (2) *Content Knowledge. The teacher candidate shall:*
- (a) Describe purposes and opportunities for reading, writing, and communicating within and across content areas and analyze types of new literacies and their uses for acquiring content knowledge and student understandings;
 - (b) Use new literacies for acquiring and developing content knowledge and student understanding;
 - (c) Identify and select appropriate multi-modal sources and resources for inquiry; and
 - (d) Evaluate and use discipline-specific processes of inquiry to engage in collaborative problem solving and critical thinking.
- (3) *Assessment and Instruction. The teacher candidate shall:*
- (a) Describe guiding principles and practices and examine assessment types, tools, and purposes for content literacy assessment;
 - (b) Select or develop content-specific assessment tools to evaluate student performance and the effectiveness of assessment tools for content-specific assessment;
 - (c) Identify deficits in reading and develop a plan to address using strategies aligned to the science of reading to support appropriate interventions;
 - (d) Examine factors of text complexity and analyze student data to inform and evaluate instructional practice;
 - (e) Synthesize multiple data points to evaluate and to refine content area instructional practice;
 - (f) Identify professional and literacy standards and curricula for lesson development to plan and evaluate engaging instruction that supports all learners in meeting goals and intended outcomes;
 - (g) Use professional and literacy standards and curricula to plan, implement, and evaluate lessons and instructional units of study within content areas;
 - (h) Critique effectiveness of instruction and design next steps for students and teachers;
 - (i) Examine research and theoretical frameworks and investigate evidence-based multi-modal instructional practices to develop comprehension;
 - (j) Use evidence-based multi-modal instructional practices to develop and evaluate comprehension within content areas; and
 - (k) Examine research and theoretical frameworks and investigate evidence-based multi-modal instructional practices for general academic and content specific vocabulary use.
- (4) *Professional Responsibility. The teacher candidate shall:*
- (a) Examine current trends, initiatives, and educational reform efforts as relative to content literacy;
 - (b) Explore professional dispositions and engage in critical self-reflection to construct a professional development plan as a content area literacy teacher.
 - (c) Identify organizational structures and school-based resources for specific needs; and
 - (d) Investigate opportunities for collaboration with families/school/communities and develop leadership capacities through actively participating in school-based opportunities for growth and development.
- B. Literacy Competencies for Early Childhood, Elementary, Special Education, and English to Speakers of Other Languages. Teacher candidates completing programs that lead to licensure in early childhood, elementary, English to speakers of other languages, and special education areas shall demonstrate an understanding of the following:*
- (1) *Literacy Processes. The teacher candidate shall:*
- (a) Identify the component processes involved in reading and writing aligned to the science of reading;
 - (b) Apply that knowledge to understand the reading and writing processes of native English speakers and English learners;
 - (c) Describe how key components of reading and writing processes develop and what biological, cognitive, linguistic, and sociocultural factors may influence literacy development;
 - (d) Identify characteristics that define evidence-based practices in literacy programming and instruction aligned to the science of reading;
 - (e) Use evidenced-based criteria aligned to the science of reading to select and organize print and multimedia resources for teaching reading and writing; and
 - (f) Use a variety of print and multimedia resources to engage students as readers and writers.
- (2) *Literacy Instruction in the Diverse Classroom. The teacher candidate shall:*
- (a) Develop in their students the awareness of the sounds made by spoken words;
 - (b) Systematically map speech sounds with letters and letter combinations;
 - (c) Provide extended practice for reading words to develop fluency;

- (d) Provide opportunities for students to devote energy to the meaning of text to build content vocabulary;
 - (e) Develop student understanding of what is being read to them and what they will eventually read themselves.
 - (f) Provide instruction focused on the core components of reading that lead to proficient and motivated reading behavior for all students;
 - (g) Provide instruction focused on the core components of writing that lead to proficient and motivated writing behavior for all students;
 - (h) Design speaking and listening opportunities that lead to more active, equitable, and academically oriented conversations for all students;
 - (i) Identify the role of classroom literacy instruction aligned to the science of reading in a multi-tiered system of supports and work with colleagues to provide effective interventions for students who struggle as readers and writers; and
 - (j) Provide literacy instruction that reflects and is responsive to the diversity of the classroom community and promotes all students' cultural competence through inclusive and equitable literacy learning opportunities.
- (3) *Effective Literacy Assessment.* The teacher candidate shall:
- (a) Identify the foci, purposes, and features of literacy assessments and application;
 - (b) Identify and implement a developmentally appropriate reading screener to identify students at risk for reading difficulties;
 - (c) Select or design appropriate diagnostic assessments and use data from those assessments to determine areas of need, provide targeted instruction, collaborate with instructional specialists, monitor progress, and evaluate the effectiveness of literacy instruction; and
 - (d) Use effective techniques for communicating assessment information to a variety of stakeholders.
- (4) *Researched-based literacy instruction aligned to the science of reading, to include:*
- (a) Phonological and phonemic awareness;
 - (b) Phonics and decoding;
 - (c) Fluency;
 - (d) Vocabulary;
 - (e) Comprehension of literary and informational text;
 - (f) Written expression, spelling, and grammar;
 - (g) Assessment and instructional decision-making;
 - (h) Long-term planning aligned with the literacy curriculum, student needs, instructional histories, school/grade level needs;
 - (i) Effective methods for promoting the reciprocal relationship between writing and reading;
 - (j) Strategies that foster connections to students' homes and communities; and
 - (k) Multiple opportunities for incorporating oral language variation.

.14 Teacher Preparation Competencies: Math Competencies.

A. *Math Competencies.* Teacher candidates seeking licensure to provide mathematics instruction shall demonstrate the competencies applicable to the area of licensure (PreK- Grade 3; Grade 1-6; Middle School or High School, or both).

B. *Content Knowledge.* The teacher candidate shall:

- (1) Apply mathematics content knowledge for teaching within the candidate's area of licensure;
- (2) Candidates prepared to teach elementary education shall apply content knowledge for each of the four essential topics: Numbers and Operations, Algebraic Thinking, Geometry and Measurement, and Data Analysis and Probability;
- (3) Demonstrate conceptual understanding, proficiency with procedural skills, and the ability to solve real world problems;
- (4) Recognize the coherent progression of mathematical concepts both within an age/range/grade/course and across an age/range/grade/course;
- (5) Use mathematics to model real world problems; and
- (6) Use precise mathematical language.

C. *Pedagogical Skills.* The teacher candidate shall:

- (1) Identify the appropriate sequence of mathematical learning targets for both a unit of study and an individual lesson;
- (2) Construct collaborative and self-directed learning opportunities that reflect active student engagement in learning and a growth mindset;
- (3) Develop strategies for responding to anticipated and present student misconceptions;
- (4) Design rich mathematical tasks that help students develop the conceptual understanding, procedural skills, and the ability to apply the mathematics associated with learning targets;
- (5) Integrate instructional strategies and teaching aids that enhance the learning of mathematics, such as multiple representations, manipulatives, calculators and other technological aids; and
- (6) Recognize productive struggles and unproductive struggles to promote perseverance and thinking flexibly.

D. The teacher candidate shall use multiple assessment tools and evidence-based instructional strategies to guide the mathematics instructional process.

E. The teacher candidate shall identify the cognitive process, learning theories, and developmental strategies related to the teaching and learning of mathematics.

.15 Teacher Preparation Competencies: Cultural Responsiveness.

A. Culturally Responsive Teaching. Teacher candidates seeking licensure shall demonstrate the following competencies:

(1) Teacher candidates shall demonstrate preparation to support culturally, racially, linguistically, and otherwise diverse populations of students through providing culturally responsive instruction to increase academic achievement, critical consciousness, and cultural competence; and

(2) Teacher candidates shall demonstrate required knowledge and skills to include application of competencies that support various racial, ethnic, linguistic, socioeconomic groups through teaching that promotes social justice and equity, including restorative practices and practices to develop racial literacy.

B. Cultural Competencies. The teacher candidate shall:

(1) Identify and apply the elements of culturally responsive teaching, including academic achievement, critical consciousness, and knowledge of self and at least one other culture;

(2) Identify and assess how issues such as racism, sexism, socioeconomic status, immigration, and gender impact marginalized students, families, and educators on multiple levels by:

(a) Acknowledging their own biases and inequitable actions; and

(b) Assessing how their own assumptions, values, and biases may impact their responses to students and families and result in inequitable actions and practices, and identify equitable actions and practices.

(3) Demonstrate respect for students' cultures by:

(a) Learning about students' cultural backgrounds;

(b) Seeking purposeful immersion experiences within groups different from their own;

(c) Communicating high expectations for students of all identities including gender, race, and ethnicity, language, socioeconomic, and disability;

(d) Incorporating a variety of culturally responsive materials that represent and support learning for diverse populations of children and families; and

(e) Differentiating instruction with consideration for cultural, linguistic, and academic diversity;

(4) Examine curriculum and learning materials for bias and deliver instruction with materials that center the perspectives and lived experiences of historically marginalized people;

(5) Build a safe and accessible environment, respectful of all individuals, by:

(a) Providing strategies to support students with responses to discrimination and negative attitudes associated with cultural or other differences;

(b) Creating learning environments that facilitate the active engagement of diverse populations of students; and

(c) Co-constructing the values and expectations of the school to incorporate different perspectives, including those of students, families, and colleagues; and

(6) Build relationships with families and communities by:

(a) Incorporating families' perspectives about school culture to create an environment that is inclusive and respects their values, beliefs and hopes for their children;

(b) Providing opportunities for families to be involved in their children's educational experiences by communicating regularly, in multiple ways, and including them in the curriculum;

(c) Integrating family and community-based funds of knowledge into teaching and learning; and

(d) Providing information regarding school and community resources that are available for students, educators, and families, including multilingual resources reflecting students and families' heritage languages.

CAREY M. WRIGHT, ED.D.
Interim State Superintendent of Schools

Date Received	Person(s) Providing Comment	Organization	Reg Citation	Comment Submitted	Regulation Language	DECPA Recommendation
8/9/2023	Liz Zogby	Maryland Down Syndrome Advocacy Coalition	COMAR 13A.07.06.12 Competencies	... it would be useful for Maryland to seek technical assistance from CEEDAR and/or look to the states identified by CEEDAR as having the most detailed standards for the knowledge and skills needed by general educators to educate students with disabilities, including California and Indiana.	<p><i>.12 Teacher Preparation Competencies: General Competencies.</i></p> <p><i>A. Purpose.</i></p> <p><i>(1) The general teacher preparation competencies apply to teacher candidates across all content areas and grade levels, to determine readiness to enter the profession.</i></p> <p><i>(2) The teacher candidate shall demonstrate essential knowledge and skills of general competencies that align with current expectations for teacher candidates to exit a program.</i></p> <p><i>B. Required General Competencies. The teacher candidate shall:</i></p> <p><i>(1) Use evidence-based research strategies, learning theories, and methods to help improve student performance;</i></p> <p><i>(2) Use inquiry skills and methods regularly to collect meaningful data and improve the candidate's professional practice;</i></p> <p><i>(3) Incorporate personal reflection, professionals' feedback, best practice, and expert opinion to improve the candidate's professional practice;</i></p> <p><i>(4) Demonstrate that knowledge of the learner's physical, cognitive, emotional, social, and cultural development is the basis of effective teaching of the following students:</i></p> <p><i>(a) Students from different racial, ethnic, and socioeconomic backgrounds;</i></p> <p><i>(b) Students for whom English is not their primary language;</i></p> <p><i>Students with different learning abilities; and</i></p> <p><i>(c) Students with social and emotional needs;</i></p> <p><i>(5) Create, build, and sustain a safe, inclusive learning environment by effectively:</i></p> <p><i>(a) Using trauma-informed instruction and other approaches to meet social and emotional needs;</i></p>	The competencies have been reviewed for multiple years by constituents across the State and approved by the PSTEB and SBOE. Although no modifications are recommended at this time, MSDE should continue to update the competencies for teacher candidates as needed based on Maryland teacher effectiveness and student performance data.
8/9/2023	Liz Zogby	Maryland Down Syndrome Advocacy Coalition	13A.07.06.08 D Clinical Experiences	<p>13A.07.06.09A(2) reads: "The provider of a program and a partner school shall seek to provide teacher training placements in a variety of school environments with diverse student populations that provide participants with the same kind of experiences as teachers employed in the State." [emphasis added]</p> <p>Comment: Ensure that the required practicum experience includes school settings where students with a range of disabilities are included in general education classrooms. Be explicit that "diverse student populations" includes struggling readers, English learners, and students with a broad range of disabilities, including students with significant cognitive disabilities in general education classrooms.</p>	<p><i>13A.07.06.09A(2) reads: "The provider of a program and a partner school shall seek to provide teacher training placements in a variety of school environments with diverse student populations that provide participants with the same kind of experiences as teachers employed in the State."</i></p>	The current language is in alignment with the law. More specific guidance can be provided via technical assistance.
8/9/2023	Liz Zogby	Maryland Down Syndrome Advocacy Coalition	13A.07.06.09 Clinical Experience Placements	<p>13A.07.06.09D discusses Partner School Requirements, noting that partner schools shall ensure "a well-rounded clinical experience based on student population" and "exposure to distinguished instructional practices."</p> <p>Comment: The requirements for partner schools should be more specific and robust. Partner schools should have a percentage of students with disabilities that reflects the overall population of students with disabilities in the district, and specifically students with disabilities who are included in general education classrooms. In addition, teacher candidates should have the benefit of seeing in action frameworks like MTSS/RtI and UDL being implemented with fidelity. (In the future, the findings of the Blueprint's Expert Review Teams should come to bear on the eligibility of Partner Schools to ensure optimal clinical experiences for teacher candidates.) California's "Criteria for School Placements" provides a good model: "Clinical sites (schools) should be selected that demonstrate commitment to collaborative evidence-based practices and continuous program improvement, have partnerships with appropriate other educational, social, and community entities that support teaching and learning, place students with disabilities in the Least Restrictive Environment (LRE), provide robust programs and support for English learners, reflect to the extent possible socioeconomic and cultural diversity, and permit video capture for candidate reflection and TPA completion." [emphasis added]</p>	<p><i>D. Partner School Requirements.</i></p> <p><i>(1) A partner school shall:</i></p> <p><i>(a) Assist in finding teaching training practicum placements, to ensure:</i></p> <p><i>(i) A well-rounded clinical experience based on student population and geographic location;</i></p> <p><i>(ii) Exposure to distinguished instructional practices; and</i></p> <p><i>(iii) Placement with a mentor teacher who meets the requirements outlined in §B of this regulation, and is professionally licensed in the area in which the candidate is placed; and</i></p> <p><i>(b) Actively collaborate with programs to ensure mentoring and growth of teacher candidates.</i></p> <p><i>(2) Compensation of Mentor Teachers.</i></p> <p><i>(a) Partner schools shall compensate mentor teachers who supervise participants in a teacher training practicum.</i></p> <p><i>(b) When the career ladder system is well established throughout the State, as determined by the Accountability and Implementation Board, the compensation of mentor teachers will be according to the career ladder system.</i></p>	The current language is in alignment with the law. More specific guidance can be provided via technical assistance.
8/9/2023	Liz Zogby	Maryland Down Syndrome Advocacy Coalition	13A.07.06.12 General Competencies	<p>13A.07.06.12B(4b): "students with different learning abilities"</p> <p>13A.07.06.12B(11): "student with exceptionalities" [and other examples throughout of phrases that stand in for "students with disabilities"] Comment: Replace all of the euphemisms with "students with disabilities." Students with disabilities are a legally protected class and when the regulations are referring to students who have been identified as students with disabilities (through either the IEP or 504 process) that should be stated explicitly. In addition, to dismantle the ableism that contributes to low expectations and bias, our teachers and education systems must learn to recognize disability as a source of identity. The use of euphemistic language seems to indicate discomfort with disability, which does a disservice to these students and their nondisabled peers in appropriately understanding disability within a social model.</p>	<p>Multiple</p> <p><i>Apply instructional supports including a 504 Plan and an individualized education plan, to support a student with exceptionalities by providing developmentally appropriate access to age-level or grade-level instruction, individually and in collaboration with colleagues</i></p> <p><i>Use assistive technologies ranging from low-tech to high-tech devices or equipment, materials, and resources to educate individuals whose exceptionalities interfere with written or verbal communication.</i></p>	Concur with the recommendation to replace the word "exceptionalities" with "disabilities." The terminology should be clear and consistent. Nonsubstantive change.
8/9/2023	Liz Zogby	Maryland Down Syndrome Advocacy Coalition	13A.07.06.12 General Competencies	<p>13A.07.06.12B(9): "Apply instructional supports including a 504 Plan and an individualized education plan, to support a student with exceptionalities by providing developmentally appropriate access to age-level or grade-level instruction, individually and in collaboration with colleagues." Comment: Students who have a 504 Plan or an IEP are students with disabilities. Further, the regulations should clearly acknowledge the distinctions between IEPs and 504s. Many students with disabilities do not have "developmental" disabilities; references to "developmentally appropriate access" and age-level instruction are confusing and nonspecific. All students, regardless of disability, require access to the curriculum for the grade in which they are enrolled, and 504 Plans and IEPs are designed to detail the supports and services required for such access. Suggested replacement language: "Provide accommodations, differentiated instruction, modifications, and instructional supports, individually and in collaboration with colleagues, as outlined in Individualized Education Plans (IEPs), and provide accommodations and instructional supports in 504 Plans, to support students with disabilities and ensure access to grade-level curriculum and nondisabled peers."</p>	<p><i>Apply instructional supports including a 504 Plan and an individualized education plan, to support a student with exceptionalities by providing developmentally appropriate access to age-level or grade-level instruction, individually and in collaboration with colleagues.</i></p>	<p>Concur with the recommendation to replace the word "exceptionalities" with "disabilities." The terminology should be clear and consistent. Nonsubstantive change.</p> <p>The term Individualized Education Plan is incorrect. This is a typo and should read Individualized Education Program. Nonsubstantive change.</p> <p>The language cited does not state that candidates will provide instructional support to students with developmental disabilities. It requires candidates to provide age or grade-level instruction that is developmentally appropriate to students with disabilities, including supports documented in a 504 Plan or IEP. If clarification is required, it may be done via technical assistance. No modifications to this language are recommended at this time.</p>
8/9/2023	Liz Zogby	Maryland Down Syndrome Advocacy Coalition	13A.07.06.12 General Competencies	<p>13A.07.06.12B(13) reads: "Implement Response to Intervention (RtI), Universal Design for Learning (UDL), and Direct Instruction (DI) to differentiate instruction." Comment: While understanding and implementing an RtI framework with fidelity is critical for supporting struggling learners and providing interventions that prevent unnecessary referrals to special education, and utilizing UDL is critical to meeting the needs of all learners, including diverse student populations and students with disabilities, neither of these are means of differentiating instruction. Differentiation can occur within an RtI or a UDL framework, but neither are ways to differentiate instruction.</p>	<p><i>Implement Response to Intervention (RtI), Universal Design for Learning (UDL), and Direct Instruction (DI) to differentiate instruction.</i></p>	<p>The intent of this requirement is to require candidates to demonstrate the ability to differentiate instruction within an RTI or UDL framework. If further clarification is required, it can be provided via technical assistance.</p> <p>No modifications are recommended at this time.</p>

8/9/2023	Liz Zogby	Maryland Down Syndrome Advocacy Coalition	13A.07.06.12 General Competencies	13A.07.06.14C(5) includes: "instructional strategies and teaching aides... and other technological aides". Comment: Replace with "aids."	13A.07.06.14C(5) includes: "instructional strategies and teaching aides... and other technological aides".	Concur with recommendation. This is a clear typo. "aide" should be replaced with "aid." Nonsubstantive change.
8/9/2023	Liz Zogby	Maryland Down Syndrome Advocacy Coalition	13A.07.06.15 Cultural Responsiveness	Cultural Responsiveness 13A.07.06.15 Teacher Preparation Competencies: Cultural Responsiveness Comment: Explicitly include disability throughout this section. There is ample literature on Culturally Responsive Teaching that situates disability as identity and makes explicit the need to acknowledge ableism as a damaging form of bias and a source of inequity. 13A.07.06.15A(1) change "culturally, racially, linguistically, and otherwise diverse populations of students" to "culturally, racially, linguistically, and otherwise diverse populations of students including students with disabilities." In 13A.07.06.15A(2) change "support various racial, ethnic, linguistic, socioeconomic groups" to "support various racial, ethnic, linguistic, socioeconomic, and disability groups."	(1) <i>Teacher candidates shall demonstrate preparation to support culturally, racially, linguistically, and otherwise diverse populations of students through providing culturally responsive instruction to increase academic achievement, critical consciousness, and cultural competence; and</i> (2) <i>Teacher candidates shall demonstrate required knowledge and skills to include application of competencies that support various racial, ethnic, linguistic, socioeconomic groups through teaching that promotes social justice and equity, including restorative practices and practices to develop racial literacy.</i>	The intent of the drafted language is that all students, regardless of disability status, are supported. Clarification, if required, may be done through technical assistance. During phase 2 of promulgation, amend the language to explicitly include disability as an identity. No modifications recommended at this time.
8/9/2023	Liz Zogby	Maryland Down Syndrome Advocacy Coalition	13A.07.06.15 Cultural Responsiveness	In 13A.07.06.15B(2) add "ableism" to the list. (2) Identify and assess how issues such as racism, sexism, socioeconomic status, immigration, and gender impact marginalized students, families, and educators on multiple levels by: (a) Acknowledging their own biases and inequitable actions; and (b) Assessing how their own assumptions, values, and biases may impact their responses to students and families and result in inequitable actions and practices, and identify equitable actions and practices.	<i>Identify and assess how issues such as racism, sexism, socioeconomic status, immigration, and gender impact marginalized students, families, and educators on multiple levels by:</i> (a) <i>Acknowledging their own biases and inequitable actions; and</i> (b) <i>Assessing how their own assumptions, values, and biases may impact their responses to students and families and result in inequitable actions and practices, and identify equitable actions and practices.</i>	The drafted language includes the term "such as" and therefore does not limit the issues to those stated explicitly. Other examples of issues that cause biases and assumptions may also be included without explicitly being stated in the regulation. No modifications recommended at this time.
8/10/2023	Dr. Elaine Meyer-Lee	Goucher College	COMAR 13A.07.06.07 C(4)	We must work together to reduce the barriers to teacher educators in the current system, not introduce two systems with different standards that may inadvertently disadvantage certain demographics. Goucher would like to suggest that we cooperate to provide: <ul style="list-style-type: none">A State-supported system of tutoring for all required examinationsState support of exam and internship fees with possible stipend incentives for traditional internsState support for Community College/Four-Year College collaboratives in providing high-quality programsReduction of MSDE approval times for proposed programmatic changes (six months to one month)Expansion of the TAM and STEM pipelines with the ability to grant college credits for a limited number of high school credits earned in these dual enrollment programs	C. Program Approval Process Where No National Content Standards Are Available. (1) <i>As part of the approval process for proposed programs for which there are no national content standards, the Department shall review the program application, and may also conduct an on-site review if considered necessary by the Department to confirm information in the application.</i> (2) <i>A program approved under this section shall complete all requirements in §A to receive program approval.</i> (3) <i>At least 6 months before requesting program approval, a provider shall notify the Department of its intent to initiate the review process for a program for which there are no national content standards.</i> (4) <i>At least 6 months before the approval is requested, the provider shall submit the application for approval to the Department.</i> (5) <i>The provider shall ensure this application includes:</i> (a) <i>A description of the proposed program;</i> (b) <i>A detailed description and outline of proposed program content and coursework; and</i> (c) <i>Identification of national content standards most closely related and relevant to the proposed program.</i>	State support of exam and internship fees with possible stipend incentives for traditional interns - these regulations are not the appropriate mechanism to provide stipends. HB1219 (2023) establishes a stipend program for interns in Maryland educator preparation programs. State support for Community College/Four-Year College collaboratives in providing high-quality programs - unclear if this is in reference to fiscal support. If so, these regulations are not the appropriate mechanism to provide fiscal support. MSDE does provide regular technical assistance and consistent support to EPPs and AAT programs. Reduction of MSDE approval times for proposed programmatic changes (six months to one month)-the cited regulation pertains to those programs that do not have national content standards available to use during the review process. Approval timelines for other programs are established in MSDE policy and are not found in these regulations. It is important to note that the review of an educator preparation program involves a team of MSDE content experts and program approval experts who conduct an extensive review of every aspect of the program, including but not limited to, program goals, course syllabi, faculty qualifications, demonstrated need, and key assessments. This multi-disciplinary team meets multiple times to discuss the findings prior to making a recommendation to the State Superintendent. To ensure that Maryland is approving only those quality programs that will result in candidates demonstrating the knowledge and skills to enter Maryland classrooms, MSDE will continue to conduct proposal reviews in a methodical and rigorous manner. Expansion of the TAM and STEM pipelines with the ability to grant college credits for a limited number of high school credits earned in these dual enrollment programs- these regulations do not include requirements for TAM or STEM high school programs
8/13/2023	Michelle Dunkle; Joann Ericson; Maggie Madden; Saroja Warner; Cheri Wittmann	(all former employees of MSDE and IHEs and/or LEAs)	N/A	...we would ask that this document and subsequent explanations elaborate on the anticipated approval process for what was once considered nationally to represent the gold standard for approving alternative programs. MSDE was a principal player in the national discussion surrounding the requirements for state certification through alternative preparation programs. Monitoring programs in Maryland through the program approval process was last employed in 2017, a full six years ago. We would also suggest that you expedite the joint review by the MSDE and the Maryland Higher Education Commission of national accrediting agencies to complete the work of §11–208 from the 2016 legislative session. Lastly, communicate in some detail the implementation plan for these regulations and establish the collaborative monitoring process of educator preparation programs within the next year, thus providing additional assurance that all programs are meeting all expectations.	A. In this regulation, "national accreditation" means teacher education accreditation by an accrediting agency recognized by the Department and the Commission.	The process by which MSDE and MHEC recognize national accrediting agencies may be developed through policy. Once finalized, this policy will be disseminated. The MSDE will provide detailed information regarding the implementation of the regulations once they are adopted.
8/11/2023	Deans and Directors Council	Multiple	N/A	The entire higher education community of teacher educators is ready to build more and better pathways into teaching that are both efficient and effective, but it would be counterproductive to create programs that are not all held to the same standards. We all must address the urgent teacher shortages in Maryland schools. Rather than opt for lower quality "quick-fix" solutions, a better approach would be to address the barriers directly: If it is too expensive to become a teacher, we should find ways to pay some or all of the expenses: <ul style="list-style-type: none">State support for licensure exam feesState support for tutoring and workshops to help teacher candidates pass licensure examsState support to pay teacher candidates for internships	n/a	MSDE notes the recommendations in this comment; however, these regulations are not the appropriate mechanism to provide fiscal support for candidate internships, assessment fees, or tutoring. It should be noted that HB1219 (2023) establishes a stipend program for interns in Maryland educator preparation programs.

8/11/2023	Deans and Directors Council	Multiple	N/A	<p>If traditional teacher preparation programs are not the right fit for career changers, paraprofessionals, or recent graduates, we should:</p> <ul style="list-style-type: none"> • Create flexible programs (online, hybrid, etc.) where universities and community colleges can collaborate to deliver high-quality teacher preparation • Encourage school districts to work with Department of Labor and higher education providers to establish registered apprenticeships • Invest in high-quality grow-your-own programs in collaboration with higher education regional centers 	n/a	<p>MSDE agrees that Maryland educator preparation program providers should create flexible programs that involve collaboration, districts should work with the MSDE and the Department of Labor to develop apprenticeships, and the state should invest in high-quality grow your own programs. The drafted regulations do not impede any of these recommendations.</p> <p>No modifications are recommended at this time.</p>
8/11/2023	Deans and Directors Council	Multiple	N/A	<p>Our State, like the nation, faces urgent teacher shortages, and we are united in our desire and efforts to address the present crisis. However, we feel concerned that one section of the proposed regulations may result in unintentionally undermining the quality and retention of teachers in our schools, namely under Subtitle 12 Educator Licensure, 13A.12.02 Teachers, .03 Pathways to Teacher Licensure, A. In-State Pathways to Initial Teacher Licenses: (2) In-District Training Programs.</p> <p>Currently both traditional and alternative pathways into teaching require completion of rigorous coursework and passing high-stakes performance and content knowledge assessments. The In-District Training Programs will create a short cut around the high-quality controls required by the Blueprint and result in lowering the quality of the teachers in our schools.</p>	n/a in these regulations (see licensure regulations)	<p>For many years, Maryland has allowed individuals seeking to change careers the ability to earn a teaching certificate via "credit count" by completing specific courses outlined in the regulations. Often referred to as the "transcript analysis pathway," these courses are not required to be offered by the same program or in a certain sequence and are not approved by the MSDE. The In-District Training Program offers a structured and cohesive pathway to licensure that is reviewed, approved, and monitored by the MSDE. It includes not only content and pedagogical coursework, but also an intensive induction program, demonstration of effective instructional practices, and an attestation from those involved that the individual is ready for licensure.</p> <p>The PSTEB and SBOE agreed with MSDE's recommendation to eliminate the credit count route to licensure. In order to maintain a non-traditional route to licensure for career changers, MSDE developed a more rigorous pathway that allows districts the flexibility to develop in-district training that is aligned with the rigor of the Blueprint for Maryland's Future. Over the course of multiple meetings, members of the PSTEB shared their agreement that an in-district training program would bring more rigor and accountability to the transcript analysis pathway and voiced support for this route to licensure. The PSTEB and SBOE hope to see collaboration between LEAs and IHEs in Maryland to set the standard for the nation for in-district pathways to licensure.</p> <p>No modifications are recommended at this time.</p>
8/11/2023	Deans and Directors Council	Multiple	COMAR 13A.07.06.07 C(4)	<p>If it takes too long for universities to change programs to adapt to current urgent needs, we should:</p> <ul style="list-style-type: none"> • Reduce the time for MSDE review of program changes • Create collaborative programs through consortia that can be offered across the state and online • Incentivize change with competitive state funding 	<p>C. Program Approval Process Where No National Content Standards Are Available. <i>(1) As part of the approval process for proposed programs for which there are no national content standards, the Department shall review the program application, and may also conduct an on-site review if considered necessary by the Department to confirm information in the application.</i> <i>(2) A program approved under this section shall complete all requirements in §A to receive program approval.</i> <i>(3) At least 6 months before requesting program approval, a provider shall notify the Department of its intent to initiate the review process for a program for which there are no national content standards.</i> <i>(4) At least 6 months before the approval is requested, the provider shall submit the application for approval to the Department.</i> <i>(5) The provider shall ensure this application includes:</i> <i>(a) A description of the proposed program;</i> <i>(b) A detailed description and outline of proposed program content and coursework; and</i> <i>(c) Identification of national content standards most closely related and relevant to the proposed program.</i></p>	<p>The cited regulation pertains to those programs that do not have national content standards available to use during the review process. Approval timelines for other programs are established in MSDE policy and are not found in these regulations. It is important to note that the review of an educator preparation program involves a team of MSDE content experts and program approval experts who conduct an extensive review of every aspect of the program, including but not limited to, program goals, course syllabi, faculty qualifications, demonstrated need, and key assessments. This multi-disciplinary team meets multiple times to discuss the findings prior to making a recommendation to the State Superintendent. To ensure that Maryland is approving only those quality programs that will result in candidates demonstrating the knowledge and skills to enter Maryland classrooms, MSDE will continue to conduct proposal reviews in a methodical and rigorous manner.</p>
8/11/2023	Robert Eccles	JHU	13A.07.06.02	<p>Review the definitions of "clinical mentor" and "mentor teacher" in 13A.07.06.02. They appear synonymous and as such is likely to add confusion; using one term is better.</p>	<p><i>"Clinical Mentor" means a highly competent teacher, trained and selected by the partner school, who will work to instill in the participant the skills, attitudes, values, and knowledge necessary for the next generation of teachers.</i></p> <p><i>"Mentor teacher" means a highly competent educator, trained and selected by the partner school, who will work to instill in the participant the skills, attitudes, values, and knowledge necessary for the next generation of teachers.</i></p>	<p>Given clinical mentor is further defined in 13A.07.06.09B, it is recommended that the definition be removed from the definitions regulation to avoid confusion. Nonsubstantive change.</p> <p>B. A clinical mentor teacher shall: <i>(1) Be a highly competent teacher demonstrated by evidence of impacting student achievement;</i> <i>(2) Be trained and selected by the partner school;</i> <i>(3) Hold a professional Maryland educator license;</i> <i>(4) Have the skills and knowledge needed to mentor teacher training practicum participants and to instill the skills, attitudes, values, and knowledge necessary for the next generation of teachers;</i> <i>(5) Provide opportunities for teacher training practicum participants in guided, hands-on, practical applications and demonstrations of a candidate's professional knowledge while applying educational theory through collaborative and facilitated learning tasks, activities, and assessments</i> <i>(6) Have teaching and release time per the implementation of the county board approved career ladder to mentor candidates and lead workshops and demonstrations at the school level; and</i> <i>(7) Will collaborate with the educator preparation program to evaluate participants in a teacher training practicum to ensure each participant demonstrates the competencies required of certified teachers; and</i> <i>(8) Be selected using the following criteria:</i> <i>(a) From the career ladder system, as applicable, when the Accountability and Implementation Board determines that the career ladder system is well established throughout the State;</i> <i>(b) Until the Accountability and Implementation Board makes a determination that the career ladder is well established, meet the requirements of B(1)-(7) of this regulation; and</i> <i>(c) A partner school may select a clinical mentor who is not on the career ladder if the partner school can demonstrate the need</i></p>
8/11/2023	Robert Eccles	JHU	In 13A.07.06.	<p>In 13A.07.06.07.B(2), references are made to pre-employment training and pre-practicum experiences. Neither has a published definition so either define them for providers or remove them.</p>	<p><i>.07.B(2) The provider shall ensure this professional development includes, but is not limited to, pre-employment training, initial coursework, pedagogy, and pre-practicum experiences.</i></p>	<p>Definitions for "pre-practicum" and "pre-employment training" are not necessary. These terms may be interpreted as happening prior to the practicum and employment, respectively. Clarification, if needed, may be provided via technical assistance.</p> <p>No modifications are recommended at this time.</p>

8/11/2023	Robert Eccles	JHU	13A.07.06.02	Update the definition of alternative teacher preparation program from 13A.07.06.02 to reflect new language from HB1219 (2023).	13A.07.06.02 (3) "Alternative teacher preparation program" means a sequence of courses established by a county board and approved by the State Superintendent that leads to a participant receiving a resident teacher certificate issued by the Department and includes teaching assignments with supervision and mentoring by a qualified teacher.	HB 1219(2023) modified the definition of the Alternative Teacher Preparation program as follows: ... means a program: 1. ESTABLISHED by a county board, AN INSTITUTION OF HIGHER EDUCATION, OR A NONPROFIT ORGANIZATION and approved by the State Superintendent; OR 2. ESTABLISHED BY THE DEPARTMENT; (II) THAT LEADS to a participant receiving a Resident Teacher Certificate issued by the Department; and (III) THAT INCLUDES teaching assignments with supervision and mentoring by a qualified teacher. An alternative teacher preparation program for an early childhood education certification shall require each participant to successfully: 1. complete a teacher training practicum; or 2. satisfy criteria established by the department under subparagraph (ii) of this paragraph that evaluate the knowledge and skills from prior learning relating to early childhood education. Recommend updating the definition after initial adoption, which is a legally sufficient option.
8/11/2023	Robert Eccles	JHU	13A.07.06.03	Consider inserting the now-published 2024 CACREP Standards in 13A.07.06.03: https://www.cacrep.org/news/2024-cacrep-standards/	13A.07.06.03(2) (2) Introduction to the 2016 CACREP Standards, Council for Accreditation of Counseling & Related Educational Programs (CACREP), 2016.	The Incorporation by Reference regulation will be amended annually, at a minimum, to address updates to those standards that are incorporated.
8/14/2023	Rachel Hise	AIB	Length of Teacher Practicum (13A.07.06.08D)	The AIB further recommended that the experiences and skills that undergraduate teacher candidates should receive over the course of the undergraduate practicum be specified in the regulations, including classroom experience in diverse settings with different types of students/learners and at different times in the school year, such as the beginning of a school year, the end of a marking period, and prior to standardized testing.	D. Clinical Experiences. (1) Each participant in an undergraduate, graduate, or alternative teacher preparation program shall complete a teacher training practicum as a requirement for program completion. (2) A provider shall ensure that a teacher training program incorporates classroom observations in which the candidate is observed in different school settings at the beginning of the program to assist in determining if the candidate has the aptitude and temperament for teaching. (3) A teacher training practicum may be completed consecutively or over the course of the program. (4) Before July 1, 2025, a provider shall ensure that a teacher preparation program has a required practicum of a minimum of 100 days.	The drafted language in 13A.07.06.09 Clinical Placements, states the following, which is verbatim from the Blueprint for Maryland's Future (Education Article 6-121): .09 Clinical Experience Placements. A. A partner school and a provider shall establish a teacher training practicum through a written partnership agreement, as follows: (1) The provider of a program shall prioritize selecting partner schools within its same community; (2) The provider of a program and a partner school shall seek to provide teacher training placements in a variety of school environments with diverse student populations that provide participants with the same kind of experiences as teachers employed in the State; and (3) The instructional program and work organization of a partner school located in a local school system shall reflect the career ladder once the Accountability and Implementation Board determines that the career ladder system is well established throughout the State. Guidance regarding what times of the year and what events should be considered as part of the practicum experience can be provided through technical assistance and policy.
8/14/2023	Rachel Hise	AIB	Eligibility of a mentor teacher (13A.07.06.09B)	The MSDE further revised this section of the proposed regulations to include substantial upgrades that address how a mentor teacher will be identified in the interim until the career ladder is well established. Seven criteria were established to ensure that the mentor teacher is a highly competent teacher. The AIB agrees that this additional language is useful and comprehensive. In some elements, additional clarification or examples may be needed to ensure consistent selection practices to ensure highly competent teachers. For example, criteria B(1) notes the mentor teacher should "be a highly competent teacher demonstrated by evidence of impacting student achievement." While this is fair it is vague and open-ended leaving room for significant variance across the State. The AIB recommends that this be modified to specify permissible locally determined options such as principal/supervisor recommendation supported by recent teacher evaluation, recent observation data, Student Learning Objective (SLO) data, student performance data, etc. These can be added to the regulations at a later date.	B. A clinical mentor teacher shall: (1) Be a highly competent teacher demonstrated by evidence of impacting student achievement; (2) Be trained and selected by the partner school; (3) Hold a professional Maryland educator license; (4) Have the skills and knowledge needed to mentor teacher training practicum participants and to instill the skills, attitudes, values, and knowledge necessary for the next generation of teachers; (5) Provide opportunities for teacher training practicum participants in guided, hands-on, practical applications and demonstrations of a candidate's professional knowledge while applying educational theory through collaborative and facilitated learning tasks, activities, and assessments (6) Have teaching and release time per the implementation of the county board approved career ladder to mentor candidates and lead workshops and demonstrations at the school level; and (7) Will collaborate with the educator preparation program to evaluate participants in a teacher training practicum to ensure each participant demonstrates the competencies required of certified teachers; and (8) Be selected using the following criteria: (a) From the career ladder system, as applicable, when the Accountability and Implementation Board determines that the career ladder system is well established throughout the State; (b) Until the Accountability and Implementation Board makes a determination that the career ladder is well established, meet the requirements of B(1)-(7) of this regulation; and (c) A partner school may select a clinical mentor who is not on the career ladder if the partner	Guidance regarding examples of evidence that impacts student achievement may be provide via technical assistance and/or policy. No further modifications are recommended at this time.
8/14/2023	Rachel Hise	AIB	n/a	The AIB recommended that several provisions in the Blueprint law related to educator preparation programs be included in the regulations, such as the requirement that the instructional program and work organization of partner schools in teacher practica be designed to reflect the career ladder and the authorization of MSDE and the Maryland Higher Education Commission (MHEC) to approve teacher preparation apprenticeship programs registered with the Maryland Department of Labor. AIB 2023 Update: The regulations do not include these provisions. These can be added to the regulations at a later date.	n/a	The following language is found in 13A.07.06.09A(3): (3) The instructional program and work organization of a partner school located in a local school system shall reflect the career ladder once the Accountability and Implementation Board determines that the career ladder system is well established throughout the State. No further modifications are required. Current law states that "The Department and the Maryland Higher Education Commission may authorize a teacher preparation program or an alternative teacher preparation program to establish an apprenticeship program registered with the Maryland Department of Labor." Given the law is clear and no further interpretation is required, it is not necessary to include it in regulation. Should the MSDE/MHEC wish to codify the process by which authorization is provided, the regulations may be amended in the future to include the process.
8/14/2023	Rachael Donnelly, President The Reading League Maryland	The Reading League Maryland	13A.07.06.08 State Program Approval Requirements: C(1)(e); C(2)(a); C(2)(b); C(5)(b)(iv)	We are concerned that multiple terms such as "science of reading", "principles of scientifically based reading practices," "research-based literacy instruction" are frequently used and could be inconsistently applied. Ensuring the regulatory language is consistent and well defined is critical and will help teachers and teacher preparation programs understand what is expected of them when the term "science of reading" and similar terms are used in code.	Multiple	After the regulations are adopted, promulgate the amendments that include a definition for the "science of reading" and change the terminology to remain consistent throughout the regulations. Prior to adoption, clarify in policy. No modifications are recommended at this time.

8/14/2023	Rachael Donnelly, President The Reading League Maryland	The Reading League Maryland	13A.07.06.13B	<p>The draft literacy competencies in these regulations are a good start; but they lack the coherence of succinctly-written and comprehensive competencies adopted by other states. In March 2020, after 5 years of work, the MSDE-supported Maryland Elementary Literacy Work Group released the "Maryland Elementary Literacy Competencies." The Work Group developed literacy standards carefully aligned to national standards and evidence-based reading research to redesign Maryland's existing elementary literacy program to include 14 literacy competencies organized into 48 organizing principles. The Reading League Maryland's Policy Committee members carefully cross-referenced the Maryland Elementary Literacy Competencies with the Early Literacy Competencies in these proposed regulations (Section .13B). While each of the competencies are listed in the draft regulations, they are not structured or coherent like those in the Work Group's competencies.</p>	<p><i>B. Literacy Competencies for Early Childhood, Elementary, Special Education, and English to Speakers of Other Languages. Teacher candidates completing programs that lead to licensure in early childhood, elementary, English to speakers of other languages, and special education areas shall demonstrate an understanding of the following:</i></p> <p><i>(1) Literacy Processes. The teacher candidate shall:</i></p> <p><i>(a) Identify the component processes involved in reading and writing aligned to the science of reading;</i></p> <p><i>(b) Apply that knowledge to understand the reading and writing processes of native English speakers and English learners;</i></p> <p><i>(c) Describe how key components of reading and writing processes develop and what biological, cognitive, linguistic, and sociocultural factors may influence literacy development;</i></p> <p><i>(d) Identify characteristics that define evidence-based practices in literacy programming and instruction aligned to the science of reading;</i></p> <p><i>(e) Use evidenced-based criteria aligned to the science of reading to select and organize print and multimedia resources for teaching reading and writing; and</i></p> <p><i>(f) Use a variety of print and multimedia resources to engage students as readers and writers.</i></p> <p><i>(2) Literacy Instruction in the Diverse Classroom. The teacher candidate shall:</i></p> <p><i>(a) Develop in their students the awareness of the sounds made by spoken words;</i></p> <p><i>(b) Systematically map speech sounds with letters and letter combinations;</i></p> <p><i>(c) Provide extended practice for reading words to develop fluency;</i></p> <p><i>(d) Provide opportunities for students to devote energy to the meaning of text to build content vocabulary;</i></p>	<p>As stated in the comment, each of the competencies in the drafted regulation is aligned to the Maryland Elementary Literacy Competencies the 2020 workgroup recommended. Further clarification may be added during the second round of promulgation if required.</p> <p>No modifications recommended at this time.</p>
8/14/2023	Rachael Donnelly, President The Reading League Maryland	The Reading League Maryland	13A.07.06.13B	<p>1. The Early literacy section of the regulations is divided into three competency sections and one "catch-all" section B(4):</p> <p>a. B(1) Literacy Processes,</p> <p>b. B(2) Literacy Instruction in the Diverse Classroom, and</p> <p>c. B(3) Effective Literacy Assessment, and</p> <p>d. B(4) Researched-based literacy instruction aligned to the science of reading, to include:"</p> <p>Each of the subheadings under B(4) are misplaced and should be listed under one of the sections B(1) - B(3) to align with the Maryland Elementary Literacy Competencies document.</p> <p>2. There is inconsistency in some of the subheadings. For example, some list competencies and some subheadings list organizing principles. These should be consistent.</p> <p>3. Lines B(2)(a) through B(2)(f) do not match any of the competencies or organizing principles in the Maryland Elementary Literacy Competencies.. Subheadings B(2)(a) through B(2)(f) roughly align to organizing principles under Competency 7, but they appear to have been re-written and use language that does not match the competencies or organizing principles. This is concerning because the regulatory language includes balanced literacy jargon and doesn't follow the well-researched, evidence-aligned terminology used in the competencies developed by the Workgroup.</p> <p>4. The draft regulations include a newly introduced organizing principle that includes reading</p>	<p><i>B. Literacy Competencies for Early Childhood, Elementary, Special Education, and English to Speakers of Other Languages. Teacher candidates completing programs that lead to licensure in early childhood, elementary, English to speakers of other languages, and special education areas shall demonstrate an understanding of the following:</i></p> <p><i>(1) Literacy Processes. The teacher candidate shall:</i></p> <p><i>(a) Identify the component processes involved in reading and writing aligned to the science of reading;</i></p> <p><i>(b) Apply that knowledge to understand the reading and writing processes of native English speakers and English learners;</i></p> <p><i>(c) Describe how key components of reading and writing processes develop and what biological, cognitive, linguistic, and sociocultural factors may influence literacy development;</i></p> <p><i>(d) Identify characteristics that define evidence-based practices in literacy programming and instruction aligned to the science of reading;</i></p> <p><i>(e) Use evidenced-based criteria aligned to the science of reading to select and organize print and multimedia resources for teaching reading and writing; and</i></p> <p><i>(f) Use a variety of print and multimedia resources to engage students as readers and writers.</i></p> <p><i>(2) Literacy Instruction in the Diverse Classroom. The teacher candidate shall:</i></p> <p><i>(a) Develop in their students the awareness of the sounds made by spoken words;</i></p> <p><i>(b) Systematically map speech sounds with letters and letter combinations;</i></p> <p><i>(c) Provide extended practice for reading words to develop fluency;</i></p> <p><i>(d) Provide opportunities for students to devote energy to the meaning of text to build content vocabulary;</i></p>	<p>1- Changing the structure to embed the language in B(4) throughout B(1)-(3) is a substantive change and not required to implement the requirements.</p> <p>2. All of the language in 13A.07.06.13B is written to describe what the candidate must be able to do or understand to demonstrate competence in teaching reading. Changing the structure of the drafted language is not required to implement the requirements.</p> <p>3. In June 2023, NCTQ published a Teacher Prep Review titled Strengthening Elementary Reading Instruction. In that report, NCTQ defines what teachers need to understand and know how to explicitly and systematically teach the five components of scientifically based reading instruction. The language in the drafted regulations B(2)(a)-(e) is verbatim from the NCTQ report.</p> <p>4. Concur with the recommendation. Change language to read, " Identify and implement a developmentally appropriate reading screener to identify students at risk for reading difficulties." Nonsubstantive change.</p> <p>As the recommended replacement language does not include the explicit actions required to systematically teach the five components of reading based on NCTQ's analysis, modifications are not recommended at this time.</p>

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STATE OF MARYLAND
OFFICE OF THE ATTORNEY GENERAL
MARYLAND STATE DEPARTMENT OF EDUCATION

MEMORANDUM

TO: Dr. Carey Wright, Interim State Superintendent of Schools
Clarence Crawford, President, State Board of Education
Maleeta Kitchen, Chair, Professional Standards and Teacher Education Board

FROM: Sean M. Fitzgerald
Assistant Attorney General

DATE: November 20, 2023

RE: Attorney General's Certification of Non-Substantive Changes in Language
COMAR 13A.07.06

On July 14, 2023, the Professional Standards and Teacher Education Board (PSTEB) published amendments to COMAR 13A.12 for public comment. After public comment, PSTEB and the Maryland State Department of Education (MSDE) agreed to make ten non-substantive changes to the proposed regulation. Consistent with State Government Article §10-113, Annotated Code of Maryland, I certify that the regulations as revised after public comment do not differ substantively from the proposed text and the revisions are non-substantive. The amendments proposed by MSDE, PSTEB, and the State Board of Education do not change the position of any group affected by the regulation, decrease any benefits, or increase administrative burdens. Nor do these changes substantially affect the rights, duties, and obligations of Maryland's teachers and the public. The nature of each change and the basis for this conclusion are as follows:

.02B(8): The definition for “clinical mentor” was removed because the term does appear in the regulation. This change could reasonably have been anticipated by participants in rulemaking, as much of this definition is duplicative of COMAR 13A.07.06.09B. This amendment would not change the position of any group affected by the regulation, decrease any benefits, or increase administrative burdens.

.12B(9), (11): This regulation sets forth the general teacher preparation competencies to determine readiness to enter the profession for teacher candidates across all content areas and grade levels. Among these competencies, the regulation requires teachers to apply instructional supports and use assistive technologies to support students with “exceptionalities.” However, “exceptionalities” is an incorrect term in the context of IEPs, 504 plans, and assistive technology, which are only associated with individuals with “disabilities.” Thus, the agency seeks to replace the incorrect term “exceptionalities” with the correct term “disabilities” in .12B(9) and (11). The agency has advised that this rewording for the sake of clarity would not change application of the regulation. This change could have been reasonably anticipated by participants in rulemaking and does not change the position of any group affected by the regulation, decrease any benefits, or increase administrative burdens.

.13B(3)(b): This regulation contains the required literacy competencies each teacher candidate must demonstrate. For teacher candidates seeking licensure in Early Childhood, Elementary, Special Education, and English to Speakers of Other Languages, these candidates are required to identify and implement an appropriate reading screener. However, the reading screener is not a diagnostic assessment tool and cannot be used to identify skill gaps. Instead, it is used to identify students at risk for having skill gaps. Accordingly, the agency seeks to replace the phrase “determine skill gaps” with “identify students at risk for reading difficulties.” This is a rewording for the sake of clarity that

could have been reasonably anticipated by participants in rulemaking. This amendment would not change the position of any group affected by the regulation, decrease any benefits, or increase administrative burdens.

.14C(5): This regulation states the required math competencies each teacher candidate must demonstrate. Among the pedagogical skills that must be demonstrated, teacher candidates must integrate instructional strategies and teaching aids to enhance student learning. These teaching aids include multiple representations, manipulatives, calculators, and other technological aids. The agency seeks to amend “teaching aides” to “teaching aids” and “technological aides” to “technological aids.” This change in spelling for the sake of clarity could have been reasonably anticipated by participants in rulemaking and does not change the position of any group affected by the regulation, decrease any benefits, or increase administrative burdens.



Comments on *COMAR 13A.07.06 Programs for Professionally Licensed Personnel*
Liz Zogby, Maryland Down Syndrome Advocacy Coalition
August 9, 2023

General Comments

Any serious attempt to improve educational outcomes for students with disabilities, including students with Down syndrome whom we represent, must begin with a focus on teachers. Teachers are the most important factor affecting student outcomes – with some estimates of their effect two to three times higher than any other in-school factor.¹ For Maryland’s students with disabilities, 70% of whom spend 80% or more of each school day in general education classrooms, attention to teacher quality among both general and special educators is critical.

While some discrete specialized skills and knowledge are necessary for educating some students with low-incidence disabilities (e.g., Braille for teachers of the blind and visually impaired), in order to move the dial for both struggling learners and students with disabilities, **all general and special educators should share a “common trunk” of fundamental skills, knowledge, and attitudes.**² This shift in what teachers know will benefit all students in general education, keep many kids from being incorrectly identified as students with disabilities, and ensure that educators are equipped to meet the needs of all learners. In addition, this expanded understanding of what general and special educators must know is essential so that Maryland can continue to expand access to the general education curriculum and general education classrooms to students with disabilities, including those with significant cognitive disabilities.

A 2006 MSDE report of the K-16 Workgroup, Ad Hoc Committee on Special Education Teacher Preparation³ pointed to a host of recommended competencies for both general and special educators including:

- **Making curricular accommodations and modifications**
- **Functional behavior assessment and positive behavior support**
- **Basic understanding of disabilities and the special education process**

¹ Heubeck, E. (2023, April 26). Two-thirds of teachers say schools are falling short for struggling learners *EdWeek*. <https://www.edweek.org/teaching-learning/two-thirds-of-teachers-say-schools-are-falling-short-for-struggling-learners/2023/04>

² *ONE SYSTEM: Reforming Education to Serve ALL Students, Report of California’s Statewide Task Force Report (Five Years Later)*, (2021), p. 10, <https://www.cde.ca.gov/sp/se/sr/documents/onesystemreport2021.pdf>

³ Maryland State Department of Education, (2006, Sept.). *K-16 Workgroup: Ad Hoc Committee on Special Education Teacher Preparation*.

- **Using classroom assessments to identify students potentially eligible for special education**
- **Providing appropriate interventions and strategies for students who need additional academic or behavioral supports**
- **Communicating and collaborating with parents and professionals**
- **Sufficient core academic content (specifically for special educators)**

More recent research points to the need for general education teachers to be prepared for the expected diversity and variability in their classrooms and fluent in strategies and frameworks including **Universal Design for Learning (UDL)** and **Multi-Tiered Systems of Support (MTSS)**. Other vital skills include: the **use of assessments and progress monitoring data** to make decisions, **adaptation of curriculum**, and **effective multi-directional communication**.⁴ In addition, general education teachers need greater **knowledge about and understanding of disability**.

Special education teachers must be prepared to work collaboratively with general education teachers to support evidence-based instructional practices including differentiation in the general education classroom and modification of instructional materials and curriculum. Such support requires knowledge of **grade-level content in all core subjects**.

Both general and special educators must be prepared to collaborate, to share responsibility for all students through **co-planning and co-teaching**—which will require new skills and a significant lens change. And all educators should understand **the social and cultural models of disability**⁵ and how to provide **culturally responsive teaching** that reflects an understanding of disability and contributes positively to the creation of classroom and school communities where all students feel they belong.

The recently approved-for-publication regulations COMAR 13A.07.06.12 describe general teacher preparation competencies to include skills designed to support candidates working with students with learning differences and special needs. The competencies included in the new regulations are a start, but need significant revision to include the many skills, areas of knowledge, and development of attitudes required to meet the goal of preparing all educators to be responsible for all learners.

CEEDAR: Technical Assistance for this Work

The national OSEP-funded technical assistance center, Collaboration for Effective Educator Development, Accountability, and Reform Center (CEEDAR), is focused on helping “State Education Agencies (SEAs), Institutions of Higher Education (IHEs), and Local Education Agencies (LEAs) create aligned professional learning systems that provide teachers and leaders

⁴ Byrd, D. R. & Alexander, M. (2020). Investigating special education teachers’ knowledge and skills: Preparing general teacher preparation for professional development. *Journal of Pedagogical Research* 4(2), 72-82.

⁵ Thurber, A., & Bandy, J. (2018). Creating Accessible Learning Environments. Vanderbilt University Center for Teaching. <http://cft.vanderbilt.edu/guides-sub-pages/creating-accessible-learning-environments/>

effective opportunities to learn how to improve core and specialized instruction in inclusive settings that enable students with disabilities to achieve college and career ready standards.” The states that have made explicit recent efforts to focus on improving outcomes for students with disabilities—California, Ohio, Virginia, Vermont—and that have received recognition for making strides in early literacy—Mississippi, Tennessee, Virginia—are all among the 20 states receiving intensive technical assistance from CEEDAR.⁶ Among the states identified by CEEDAR as having the most detailed standards for the knowledge and skills needed by general educators to educate students with disabilities, are California⁷ and Indiana.⁸

CEEDAR can provide assistance to teacher educators and educator preparation programs to develop courses and programs that train general and special education teachers in the use of **High Leverage Practices (HLPs)** and **Evidence Based Practices (EBPs)** that are critical for developing a more integrated view of inclusive instruction for students with and without disabilities.⁹

Maryland is not currently working with CEEDAR and, therefore, has not utilized their technical assistance to ensure that changes being made to the requirements for educator preparation programs, licensure, and programs of professional learning are aligned with the goal of improved outcomes for students with disabilities achieved within inclusive settings.

Ensuring that all paths to teacher certification require the development of these skills and competencies is critical—and will entail more than a delineating a set of recommended competencies. MSDE must exercise its authority to approve education preparation programs, monitor courses and syllabi, and ensure that new teachers demonstrate preparedness in these competencies. An additional area needing explicit attention is that experienced teachers must have robust programs of professional learning to fill in any gaps in these skills and competencies.

Specific Comments on Proposed Regulations: COMAR 13A.07.06

1. Clinical Experiences

13A.07.06.08D Clinical Experiences; 13A.07.06.09 Clinical Experience Placements

13A.07.06.09A(2) reads: “The provider of a program and a partner school shall seek to provide teacher training placements in a variety of school environments with diverse student

⁶ <https://ceedar.education.ufl.edu/ceedar-technical-assistance/>

⁷ <https://www.ctc.ca.gov/educator-prep/program-standards> (e.g., see CA Teaching Performance Expectations)

⁸ <https://www.in.gov/doe/educators/educator-licensing/indiana-educator-standards/> (e.g., see Educator Standards: Developmental/Pedagogy)

⁹ Brownell, M. T., Holdheide, L., Kamman, M. L., & McCray, E. D. (2021). Systemic support for special education: Making it a more integral part of general teacher preparation, *American Educator*, 44(4), https://www.aft.org/ae/winter2020-2021/brownell_holdheide_kamman_mccray#A2.

High Leverage Practices: <http://highleveragepractices.org/>

populations that provide participants with the same kind of experiences as teachers employed in the State.” [emphasis added]

Comment: Ensure that the required practicum experience includes school settings where students with a range of disabilities are included in general education classrooms. Be explicit that “diverse student populations” includes struggling readers, English learners, and students with a broad range of disabilities, including students with significant cognitive disabilities in general education classrooms.

13A.07.06.09D discusses Partner School Requirements, noting that partner schools shall ensure “a well-rounded clinical experience based on student population” and “exposure to distinguished instructional practices.”

Comment: The requirements for partner schools should be more specific and robust. Partner schools should have a percentage of students with disabilities that reflects the overall population of students with disabilities in the district, and specifically students with disabilities who are included in general education classrooms. In addition, teacher candidates should have the benefit of seeing in action frameworks like MTSS/RtI and UDL being implemented with fidelity. (In the future, the findings of the Blueprint’s Expert Review Teams should come to bear on the eligibility of Partner Schools to ensure optimal clinical experiences for teacher candidates.)

California’s “Criteria for School Placements” provides a good model:

“Clinical sites (schools) should be selected that demonstrate commitment to collaborative evidence-based practices and continuous program improvement, have partnerships with appropriate other educational, social, and community entities that support teaching and learning, place students with disabilities in the Least Restrictive Environment (LRE), provide robust programs and support for English learners, reflect to the extent possible socioeconomic and cultural diversity, and permit video capture for candidate reflection and TPA completion.”¹⁰ [emphasis added]

2. Teacher Competencies

13A.07.06.12 Teacher Preparation Competencies: General Competencies

Comment: Specific suggestions for this section follow, but it would be useful for Maryland to seek technical assistance from CEEDAR and/or look to the states identified by CEEDAR as having the most detailed standards for the knowledge and skills needed by general

¹⁰ Commission on Teacher Credentialing. (2020). *Preliminary Multiple Subject and Single Subject Credential Preconditions, Program Standards, and Teaching Performance Expectations*, p. 8.
<https://www.ctc.ca.gov/docs/default-source/educator-prep/standards/prelimmsstandard-pdf.pdf>

educators to educate students with disabilities, including California¹¹ and Indiana.¹² The bolded text in the General Comments above provides a starting point for competencies.

13A.07.06.12B(4b): “students with different learning abilities”

13A.07.06.12B(11): “student with exceptionalities”

[and other examples throughout of phrases that stand in for “students with disabilities”]

Comment: Replace all of the euphemisms with “students with disabilities.” Students with disabilities are a legally protected class and when the regulations are referring to students who have been identified as students with disabilities (through either the IEP or 504 process) that should be stated explicitly. In addition, to dismantle the ableism that contributes to low expectations and bias, our teachers and education systems must learn to recognize disability as a source of identity. The use of euphemistic language seems to indicate discomfort with disability, which does a disservice to these students and their nondisabled peers in appropriately understanding disability within a social model.

Replace *13A.07.06.12B(9): “Apply instructional supports including a 504 Plan and an individualized education plan, to support a student with exceptionalities by providing developmentally appropriate access to age-level or grade-level instruction, individually and in collaboration with colleagues.”*

Comment: Students who have a 504 Plan or an IEP are students with disabilities. Further, the regulations should clearly acknowledge the distinctions between IEPs and 504s. Many students with disabilities do not have “developmental” disabilities; references to “developmentally appropriate access” and age-level instruction are confusing and nonspecific. All students, regardless of disability, require access to the curriculum for the grade in which they are enrolled, and 504 Plans and IEPs are designed to detail the supports and services required for such access.

Suggested replacement language: “Provide accommodations, differentiated instruction, modifications, and instructional supports, individually and in collaboration with colleagues, as outlined in Individualized Education Plans (IEPs), and provide accommodations and instructional supports in 504 Plans, to support students with disabilities and ensure access to grade-level curriculum and nondisabled peers.”

13A.07.06.12B(13) reads: “Implement Response to Intervention (RtI), Universal Design for Learning (UDL), and Direct Instruction (DI) to differentiate instruction.”

¹¹ <https://www.ctc.ca.gov/educator-prep/program-standards> (e.g., see California Teaching Performance Expectations)

¹² <https://www.in.gov/doe/educators/educator-licensing/indiana-educator-standards/> (e.g., see Educator Standards: Developmental/Pedagogy)

Comment: While understanding and implementing an RtI framework with fidelity is critical for supporting struggling learners and providing interventions that prevent unnecessary referrals to special education, and utilizing UDL is critical to meeting the needs of all learners, including diverse student populations and students with disabilities, neither of these are means of differentiating instruction. Differentiation can occur within an RtI or a UDL framework, but neither are ways to differentiate instruction.¹³

3. Correction

13A.07.06.14C(5) includes: “instructional strategies and teaching aides... and other technological aides”

Comment: Replace with “aids.”

4. Cultural Responsiveness

13A.07.06.15 Teacher Preparation Competencies: Cultural Responsiveness

Comment: Explicitly include disability throughout this section. There is ample literature on Culturally Responsive Teaching that situates disability as identity and makes explicit the need to acknowledge ableism as a damaging form of bias and a source of inequity.¹⁴

For example:

- In 13A.07.06.15A(1) change “culturally, racially, linguistically, and otherwise diverse populations of students” to “culturally, racially, linguistically, and otherwise diverse populations of students including students with disabilities.”
- In 13A.07.06.15A(2) change “support various racial, ethnic, linguistic, socioeconomic groups” to “support various racial, ethnic, linguistic, socioeconomic, and disability groups.”
- In 13A.07.06.15B(2) add “ableism” to the list.

Contact:

Liz Zogby

Maryland Down Syndrome Advocacy Coalition

katzogby@gmail.com, 443-691-1755

¹³ See sections on “the difference between differentiated instruction and UDL” and “how RtI fits in with differentiated instruction” in this PD module, *What is differentiated instruction?*, from the IRIS Center, the OSEP-funded TA center: <https://iris.peabody.vanderbilt.edu/module/di/cresource/q1/p01/#content>

¹⁴ See, e.g., Gadd, S., & Butler, B. R. (2018). *Culturally Responsive (Sustaining) Practices for Students with and At Risk for Disabilities: Annotated Bibliography*. National Technical Assistance Center on Transition. <https://files.eric.ed.gov/fulltext/ED601043.pdf>. Kimball, E., Abbott, J., & Childs, J. (2020, July). *Crippling equity and assessment: Disability as identity and culture in the context of culturally responsive* (Equity Response). Urbana, IL: University of Illinois and Indiana University, National Institute for Learning Outcomes Assessment. <https://www.learningoutcomesassessment.org/wp-content/uploads/2020/08/Equity-Response-KimballAbbottChilds.pdf>



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August 10, 2023

Dear Board President Crawford and Members of the Maryland State Board of Education:

We at Goucher College would like to comment on proposed regulations 13A.07.06.09, Programs for Professionally Licensed Personnel. We appreciate your efforts to update teacher education requirements and to facilitate more teachers becoming employed in the state of Maryland. Although there have already been several revisions made to the Blueprint document, we would like to offer several brief additional comments during this final comment period.

Goucher College supports Blueprint as a whole and is committed to working together with all partners to find a solution to the teacher shortage. However, section 13A.12.02 Teachers section .03 Pathways to Teacher Licensure (2)... In-District Training Programs contains language that we are concerned may inadvertently create two tiers of teachers who have been prepared using different standards. To date, Maryland Approved Programs and Maryland Alternative Preparation Programs alike have always observed the high standards set by the Maryland State Board of Education and the Maryland State Department of Education, including rigorous standards for classroom preparation and testing. This new pathway for certification will create a shorter route to certification at the expense of these higher standards and teaching excellence, impacting the ability to successfully achieve Blueprint's Pillar 2 "High Quality and Diverse Teachers and Leaders".

Goucher College is firmly committed to pursuing diversity, equity, inclusive excellence, and justice, advocating for a voice for all student educators. In creating these two pathways, our concern is that marginalized student educators may gravitate toward the new pathway and will be short-changed in their preparation. This may in turn result in a reduction of quality in the teachers that we need most as models for the next generations of students, as well as in possible retention issues.

We must work together to reduce the barriers to teacher educators in the current system, not introduce two systems with different standards that may inadvertently disadvantage certain demographics. Goucher would like to suggest that we cooperate to provide:

- A State-supported system of tutoring for all required examinations
- State support of exam and internship fees with possible stipend incentives for traditional interns
- State support for Community College/Four-Year College collaboratives in providing high-quality programs
- Reduction of MSDE approval times for proposed programmatic changes (six months to one month)

- Expansion of the TAM and STEM pipelines with the ability to grant college credits for a limited number of high school credits earned in these dual enrollment programs

Goucher College supports all efforts to educate diverse, high-quality teachers who will remain in our school systems. However, we would like to ensure that all teacher candidates are prepared using the same standards and expectations, so that our K-12 students have equitable access to the same high-quality teachers and instruction across the state of Maryland.

Respectfully Submitted,



Dr. Elaine Meyer-Lee,
Provost and Senior Vice President for Academic Affairs



Dr. Annalisa Czczulin,
Director, Graduate Programs in Education



Dr. Mary Adkins,
Chair, Undergraduate Department of Education

PSTEB/MSBOE August 2023

Dear Members of the Professional Standards in Teacher Education Board (PSTEB) and Members of the Maryland State Board of Education (MSBOE):

We are taking this opportunity to share our thoughts as individuals with long-standing relationships with the Maryland State Department of Education (MSDE), Local School Systems, Community Colleges, Institutes of Higher Education, and both local and national alternative teacher preparation programs. Beginning in 2002 with the initial federal Transition to Teaching Grant as well as the subsequent Troops to Teachers Grant in 2005, we worked under the leadership of the then-president of the MSBOE Dr. Edward Root, the Assistant Superintendent of the Division of Program Approval and Certification Dr. Larry Leak, and the Program Approval and Assessment Branch Chief Dr. Virginia Pilato to develop the Maryland Approved Alternative Preparation Program. All the MAAPP guidelines for implementation, preconditions, and standards of practice documents that remain active on the MSDE website were developed in collaboration with all partners in alternative preparation and closely with the Certification Branch of MSDE, as well.

These programs have grown and flourished over the years, and we are proud of the work that was done both by those of us who were in the initial development, and those who have worked tirelessly to continue the work of assuring a qualified, certified, productive teacher workforce. This was not easy work as the goal was to achieve alternative teacher preparation programs which would recruit, plan, prepare, and deliver programs in collaboration with a local school system, and would all meet the same standards of excellence while delivering such programs in vastly different ways. Programs were both monitored and prepared for document- and interview-driven site visits to ensure adherence to national and state standards and best practices. Thus, all Maryland-approved preparation programs were, indeed, Maryland Approved Programs which could assure the public of consistency in excellence and oversight.

We each have intimate knowledge of the level of discussion and work that has gone into the revision of regulations now proposed, including those concerning alternative preparation programs. The result reflects the contributions of many individuals in work groups, board meetings, and formal meetings dating back seven years to the TIRA Workgroup of 2016-2017. We appreciate and respect that work, as well as the needs of local schools for continued attention to changing needs and the dire circumstances faced by our entire nation regarding massive teacher shortages and the difficulty in recruiting and supporting a diverse teacher population.

However, as we review the regulations, we are reminded that the hallmark of any teacher preparation program in Maryland must remain an assurance that all teachers are meeting the same standards of excellence required by the *Blueprint for Maryland's Future* regardless of their program of preparation. Certainly, flexibility in those programs is essential to meet the awesome demands currently facing Maryland and the nation. However, we are concerned that this assurance is subverted by Subtitle 12 Educator Licensure, 13A.12.02 Teachers, .03 Pathways to Teacher Licensure, A. In-State Pathways to Initial Teacher Licenses: (2) In-District Training Programs. Careful comparisons among the pathways described would suggest that this route provides what can only be described as a workaround that, indeed, does not ensure that its completers have met the same standards as other pathways require.

Consequently, we urge you to reconsider the inclusion of this subtitle as evidence of a continued commitment to maintain, and indeed, improve the ways in which an alternative program operates in alignment with the *Blueprint for Maryland's Future*. Those pathways should continue to reflect consistency in the expectations for full professional certification in Maryland, expectations which must be grounded in excellence for all and evidenced by standards and research-based outcome competencies. In addition, we would ask that this document and subsequent explanations elaborate on the anticipated

approval process for what was once considered nationally to represent the gold standard for approving alternative programs. MSDE was a principal player in the national discussion surrounding the requirements for state certification through alternative preparation programs. Monitoring programs in Maryland through the program approval process was last employed in 2017, a full six years ago. We would also suggest that you expedite the joint review by the MSDE and the Maryland Higher Education Commission of national accrediting agencies to complete the work of §11–208 from the 2016 legislative session. Lastly, communicate in some detail the implementation plan for these regulations and establish the collaborative monitoring process of educator preparation programs within the next year, thus providing additional assurance that all programs are meeting all expectations.

Respectfully,

Michelle Dunkle

Prince George's County Public Schools 1983-2000: Classroom teacher, department chair, instructional specialist, PDS/Bowie State University Site Coordinator
MSDE 2000-2020 Division of Certification and Accreditation Program Approval and Assessment Branch; Manager TQE Grant, Transition to Teaching Grant, Troops to Teachers Grant, RTTT Section Manager; Program Approval Specialist; Maryland Approved Alternative Preparation Program (MAAPP) Coordinator
Goucher College 2020-2022 Instructor, Staff, Intern Supervisor

Joann Ericson, PhD

MSDE Division of Certification and Accreditation 1999 – 2015 Branch Chief, Certification
Goucher College Instructor, current

Maggie Madden, PhD

Towson University: Maryland Writing Project Co-Director and Director; Teacher Educator, Assistant to the Dean, College of Education
MSDE Division of Certification and Accreditation, Program Approval and Assessment Branch 1997-2019 Program Approval Specialist, Maryland Professional Development School Coordinator
University of Maryland Eastern Shore Department of Education Hazel Professor 2019-2021

Saroja R. Warner, PhD, NBCT

Montgomery County Public Schools classroom, teacher 15 years
University of Maryland College Park, teacher education instructor
MSDE Division of Certification and Accreditation Branch Chief Program Approval
WestED Director of Culturally Responsive Systems, current

Cheri Wittmann, EdD

MSDE Division of Certification and Accreditation Program Approval Branch
Teacher Quality Specialist, Coordinator of LETRS training for higher education and local school systems
RTTT Manager for Teacher Preparation for Teaching Minority and High Poverty Students, Program Approval Site Visitor

August 11, 2023

Dear Board President Crawford, Members of the Maryland State Board of Education, and Members of the Professional Standards and Teacher Education Board:

We are writing to share comments on the proposed regulations 13A.07.06.09, Programs for Professionally Licensed Personnel, from the Maryland Education Deans Council, including the University System of Maryland institutions, Morgan State University, St. Mary's College of Maryland, the Maryland Independent College and University Association (MICUA), and Maryland Association of Community College Teacher Education Programs (MACCTEP). We recognize that a tremendous amount of thought, effort, and research have gone into developing regulations that align with the intent and goals of the transformative Blueprint legislation. We appreciate that the currently proposed version of the regulations had been previously revised after receiving input from higher education partners across the state. We offer the brief comments below in the same spirit of collegial collaboration, hoping that they will provide you all with additional information to ensure that the new regulations, when implemented, achieve the goals we all share.

Our State, like the nation, faces urgent teacher shortages, and we are united in our desire and efforts to address the present crisis. However, we feel concerned that one section of the proposed regulations may result in unintentionally undermining the quality and retention of teachers in our schools, namely under Subtitle 12 Educator Licensure, 13A.12.02 Teachers, .03 Pathways to Teacher Licensure, A. In-State Pathways to Initial Teacher Licenses: (2) In-District Training Programs.

Currently both traditional and alternative pathways into teaching require completion of rigorous coursework and passing high-stakes performance and content knowledge assessments. The In-District Training Programs will create a short cut around the high-quality controls required by the Blueprint and result in lowering the quality of the teachers in our schools.

The entire higher education community of teacher educators is ready to build more and better pathways into teaching that are both efficient and effective, but it would be counterproductive to create programs that are not all held to the same standards. We all must address the urgent teacher shortages in Maryland schools. Rather than opt for lower quality "quick-fix" solutions, a better approach would be to address the barriers directly:

If it is too expensive to become a teacher, we should find ways to pay some or all of the expenses:

- State support for licensure exam fees
- State support for tutoring and workshops to help teacher candidates pass licensure exams
- State support to pay teacher candidates for internships

If traditional teacher preparation programs are not the right fit for career changers, paraprofessionals, or recent graduates, we should:

- Create flexible programs (online, hybrid, etc.) where universities and community colleges can collaborate to deliver high-quality teacher preparation
- Encourage school districts to work with Department of Labor and higher education providers to establish registered apprenticeships
- Invest in high-quality grow-your-own programs in collaboration with higher education regional centers

If it takes too long for universities to change programs to adapt to current urgent needs, we should:

- Reduce the time for MSDE review of program changes
- Create collaborative programs through consortia that can be offered across the state and online
- Incentivize change with competitive state funding

We all know that Maryland approved programs will prepare highly qualified teachers. We do not want to drive candidates to Phoenix, Western Governors University, or into a quick-fix option that will insufficiently prepare our future teachers for the realities of the classroom.

We advocate for greater flexibility and support in meeting requirements specified by the currently proposed regulations, *13A.07.06 Programs for Professionally Licensed Personnel*, so that we may expand pipelines into teaching and expedite teachers' movement through the pipelines, thus fulfilling the State's needs and the demands of Pillar II of the Blueprint. As such, we strongly suggest that In-District Training Programs be deleted from the current draft of the regulations.

We respectfully submit these comments and would be happy to provide any additional information that would be helpful.

Sincerely,



Rhonda Jeter, Ph.D.
Co-Chair, Maryland Education Deans Council
Dean, College of Education
Bowie State University




Barbara Marinak, Ph.D.
Co-Chair, Maryland Education Deans Council
Dean, School of Education
Mount St. Mary's University



Please see subsequent pages for endorsement by other Maryland institutions.



GOUCHER | college



M | I | C / A

MICUA

Maryland Independent College and University Association

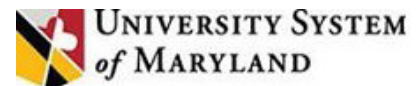
McDANIEL COLLEGE



Salisbury UNIVERSITY



STEVENSON UNIVERSITY





Alexandra Cambra -MSDE- <alexandra.cambra@maryland.gov>

Public comment

3 messages

Robert Eccles <reccles1@jhu.edu>

Fri, Aug 11, 2023 at 2:45 PM

To: Alexandra Cambra -MSDE- <alexandra.cambra@maryland.gov>

Good afternoon,

Please see my comments that are intending to produce non-substantive updates and clarity to the proposed regulations.

1. Review and delete all definitions for terms no longer found in the body of either regulation.

Ex: *Performance Review Program* definition from 13A.12.01.02

2. Review the definitions of “clinical mentor” and “mentor teacher” in 13A.07.06.02. They appear synonymous and as such is likely to add confusion; using one term is better.
3. In 13A.07.06.07.B(2), references are made to pre-employment training and pre-practicum experiences. Neither has a published definition so either define them for providers or remove them.
4. Update the definition of *alternative teacher preparation program* from 13A.07.06.02 to reflect new language from [HB1219](#) (2023).
5. Consider inserting the now-published 2024 CACREP Standards in 13A.07.06.03:

<https://www.cacrep.org/news/2024-cacrep-standards/>

Have a nice day.

Robert Eccles

Robert Eccles (he/him/his)*Accreditation and Program Development Specialist**Office of Innovative Learning, Design and Assessment (OILDA)**School of Education**Johns Hopkins University**2800 N Charles St, Baltimore, MD 21218**C: 240-483-1915*

This e-mail contains information that may be confidential. If you have received this in error, please notify me immediately and delete this e-mail.

Alexandra Cambra -MSDE- <alexandra.cambra@maryland.gov>
To: Robert Eccles <reccles1@jhu.edu>

Fri, Aug 11, 2023 at 3:01 PM

Received, with thanks.

[Quoted text hidden]



Alexandra Cambra (She/Her)

Director of Program Approval,
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Fri, Aug 11, 2023 at 3:03 PM

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Implementation
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BLUEPRINT FOR MARYLAND'S FUTURE

MEMORANDUM

To: Members of the Professional Standards and Teacher Education Board
Members of the State Board of Education
Superintendent Mohammed Choudury

From: Rachel Hise, Executive Director

Date: August 14, 2023

RE: PSTEB regulations approved by MSBE on 1/24/23 for publication
COMAR 13A.07.06 Programs for Professional Licensed Personnel
COMAR 13A.12 Educator Licensure

As you know, the Blueprint law requires the Maryland State Board of Education (MSBE) and the Professional Standards and Teacher Education Board (PSTEB) in consultation with the Accountability and Implementation Board (AIB) to adopt regulations to carry out provisions of the law related to education preparation programs and educator licensure. A version of these regulations was first proposed by the Maryland State Department of Education (MSDE) and PSTEB in 2019 based in part on the interim recommendations of the Commission for Innovation and Excellence in Education (i.e. Kirwan). They have been revised several times since then. In May 2022 the AIB, along with stakeholders and members of the public, provided comments on the proposed regulations that were published in January 2022. The MSDE and PSTEB further revised the regulations based on the AIB and other comments. The most recent version of the proposed regulations was approved by the MSBE (it had previously been approved by the PSTEB) in January 2023 for publication. The public comment period opened July 14, 2023, and closes August 14, 2023.

At the AIB's August 10, 2023 meeting, the AIB approved Executive Director Hise sending public comments to MSBE/MSDE and PSTEB based on AIB staff recommendations. This memo includes the AIB's comments. First, the AIB recognizes the numerous changes that MSBE and PSTEB made to the regulations in response to the AIB's and other public comments. The latest version of the regulations is much better aligned with the Blueprint and addresses many of the AIB's recommendations. It also includes important additions related to science of reading alignment throughout the scope of teacher training and training for teacher candidates in providing literacy instruction in a diverse classroom setting, among other additions. **The AIB recommends that MSBE/MSDE and PSTEB continue to address several items discussed below, collaborate with institutions of higher education and local education agencies (LEA) in the implementation of the regulations, and expand upon innovative ways to prepare, license and professionally develop Maryland's teachers.**

COMAR 13A.07.06 Programs for Professional Licensed Personnel (Educator Preparation)

AIB Comments in 2022 and whether they have been adequately addressed:

Length of Teacher Practicum (13A.07.06.08D) – The AIB recommended that the statutory language “equivalent to a full school year” be included in the regulations to be more accurate and to provide some flexibility for teacher preparation programs to implement the new requirement. *The revised proposed regulations are consistent with the AIB comments and Blueprint law.*

The AIB further recommended that the experiences and skills that undergraduate teacher candidates should receive over the course of the undergraduate practicum be specified in the regulations, including classroom experience in diverse settings with different types of students/learners and at different times in the school year, such as the beginning of a school year, the end of a marking period, and prior to standardized testing. *The revised proposed regulations do not address this recommendation and it remains an important element of teacher training to ensure new teachers are adequately prepared to teach all Maryland students.*

Eligibility of a mentor teacher (13A.07.06.09B) – To eliminate confusion in the use of the term “mentor teacher” and distinguish mentor teachers supervising student teachers in a practicum, the AIB recommended that the regulations use a specific term for those working in a practicum such as “clinical mentor teacher”. *The proposed regulations include these provisions.*

AIB 2023 Update: The MSDE further revised this section of the proposed regulations to include substantial upgrades that address how a mentor teacher will be identified in the interim until the career ladder is well established. Seven criteria were established to ensure that the mentor teacher is a highly competent teacher. The AIB agrees that this additional language is useful and comprehensive. In some elements additional clarification or examples may be needed to ensure consistent selection practices to ensure highly competent teachers. For example, criteria B(1) notes the mentor teacher should “be a highly competent teacher demonstrated by evidence of impacting student achievement.” While this is fair it is vague and open-ended leaving room for significant variance across the State. *The AIB recommends that this be modified to specify permissible locally determined options such as principal/supervisor recommendation supported by recent teacher evaluation, recent observation data, Student Learning Objective (SLO) data, student performance data, etc. These can be added to the regulations at a later date.*

Provisions in Blueprint law not reflected in the proposed regulations – The AIB recommended that several provisions in the Blueprint law related to educator preparation programs be included in the regulations, such as the requirement that the instructional program and work organization of partner schools in teacher practica be designed to reflect the career ladder and the authorization of MSDE and the Maryland Higher Education Commission (MHEC) to approve teacher preparation apprenticeship programs registered with the Maryland Department of Labor.

AIB 2023 Update: *The regulations do not include these provisions. These can be added to the regulations at a later date.*

COMAR 13A.12 Educator Licensure

AIB Comments in 2022 and whether they have been adequately addressed:

Licensure assessment requirements – The AIB recommended that MSBE and PSTEB revise the regulations to provide the timeline for requiring a test of teaching ability beginning July 1, 2025, and the process and timing

for new assessments in reading instruction and content areas required for teacher licensure so that the new Blueprint requirements are clearly stated in the regulations. The proposed revisions to 13A.12.02.02B, now identified as 13A.12.02.03 have been changed substantively to include the addition of reference to July 1, 2025, when passing scores on a portfolio-based performance assessment will be required. There are also special provisions, beginning July 1, 2025, that require all educators in a position that requires a license in early childhood education, elementary education, special education, or English to Speakers of Other Languages to submit a passing score on a reading instruction test, approved by the State Board of Education, or attestation of proficiency through observation completed by a Department-recognized assessor using a Department-provided observation tool. ***However, the AIB notes that the regulations do not require secondary teachers to submit a passing score on a reading instruction test or other proficiency attestation, and content areas are not yet addressed. These can be added to the regulations at a later date.***

AIB 2023 Update: Additionally, the requirement of a 3.0 GPA was removed throughout the existing regulations. ***The AIB requests that the MSDE and the PSTEB provide further explanation on the reasoning for removing this existing requirement.***

Out of area assignment – Many comments were received by the AIB in 2022 regarding a requirement in the proposed regulations that a teacher who is assigned to teach outside their certified subject area must obtain licensure in the area by the *next* school year. The concern was that there is not enough time for a teacher to meet the requirement.

AIB 2023 Update: **This issue was addressed in the revised regulations** to require that if a school finds it necessary to assign a teacher to more than two classes unrelated to the teacher’s area of licensure, the teacher shall provide documentation verifying competence teaching in the area for each consecutive year after the first year. There are also provisions for notifying parents in Title 1 schools of the out of area teacher’s qualifications.

Professional Development Points – The revised proposed regulations include references to the Professional Development Points (PDP) system. The Blueprint requires the MSDE to establish a new professional development system aligned with Blueprint and career ladder by July 1, 2024. Since the career ladder does not exist yet, the AIB noted last year that it assumed the point system is transitional to a new system that will primarily embed professional development into the workday as part of the career ladder.

AIB 2023 Update: ***The AIB encourages MSDE and PSTEB to consider additional updates to the PDP regulations in the future, including:***

- ***Identify the number of PDPs awarded for mentoring***
- ***Expand the micro-credentialing pathway to identify boundaries on the types of micro-credentials that will be accepted and possible avenues for finding micro-credentialing offerings***
- ***Expand local and school based opportunities to earn PDPs for county or school specific professional development opportunities by creating a pathway for district and school administrators to develop qualifying options/alternatives.***
- ***Expand the PDP system to leverage innovations in educators’ continued growth and development as well as making connections to the career ladder***
- ***Add research and consideration of top performing systems’ approaches to professional growth***
- ***Clarify PDP for administrators and the topics areas that will be accepted. Four areas are identified however there are many additional topics that are relevant to school leadership in leadership areas that address the objective of improving student learning such as developing teacher leaders, restructuring the school day, reallocation of resources, leading community school initiatives, guiding change with employees and stakeholders, etc.***

Dual enrollment teachers – With the Blueprint’s focus on post–College and Career Ready pathways for students who are CCR, there will be a significant increase in the number of postsecondary courses (both credit–bearing and CTE training) taken by high school students (known as dual enrollment). The AIB recommended that MSDE work with LEAs and postsecondary institutions, particularly community colleges, to develop dual enrollment licensure pathways specifically for college instructors to teach postsecondary courses at high schools and for high school teachers to be credentialed to teach postsecondary courses.

AIB 2023 Update: *The regulations do not address this issue. The AIB encourages MSDE to work with the LEAs and postsecondary institutions, particularly community colleges, to develop dual enrollment licensure pathways.*

Provisions in Blueprint law not reflected in the proposed regulations – The career ladder required by the Blueprint includes several new requirements for school principals (and assistant principals) to grow professionally as school leaders and the instructional leaders of the school. These provisions are not yet reflected in the administrator licensure or license renewal requirements.

AIB 2023 Update: *This has not yet been addressed. These can be added to the regulations at a later date. The AIB encourages MSDE to review and revise the school leader and instructional leader renewal requirements and clarify the National Board Certification requirements for administrators to ensure that leaders are provided opportunities, and required as necessary, to grow professionally so they are ready to support Blueprint implementation and to assist in bringing about the desired transformation.*

#23-25



MEMORANDUM

DATE: August 14, 2023

TO: Alexandra Cambra, Director of Program
Approval, Division of Educator Certification and
Program Approval, Maryland State Department of Education

FROM: Rachael Donnelly, President
The Reading League Maryland

RE: Comments on COMAR 13A.07.06 Programs for Professionally
Licensed Personnel and COMAR 13A.12.01-.07 Educator Licensure

[The Reading League Maryland](#) is a nonprofit organization with the mission to advance the awareness, understanding and use of evidence-aligned reading instruction so that all children learn to read.

Our membership includes teachers, administrators, Maryland teacher preparation faculty and community members.

After reviewing the proposed regulations for the above referenced COMAR, we have comments about the following three components:

1. Defining similar terms like “science of reading”
2. Literacy Competencies consistency and clarity; and
3. National Board Certification

Thank you for your attention to our feedback and we look forward to working with you to incorporate these recommendations.

1) Define Science Of Reading & Similar Terms

RECOMMENDATION: Use a single term or cohesive, well defined terms, to denote what is expected. Include a definitions section if necessary.

It is clear from the proposed regulations that improving literacy instruction is a priority for the Professional Standards Teacher Education Board (PSTEB), the Maryland State Board of Education and the Maryland State Department of Education. We strongly agree with prioritizing quality literacy instruction to ensure that Maryland students learn and master the literacy and writing skills necessary to be ready for college and career.

We are concerned that multiple terms such as “science of reading”, “principles of scientifically based reading practices,” “research-based literacy instruction” are frequently used and could be inconsistently applied. Ensuring the regulatory language is consistent and well defined is critical and will help teachers and teacher preparation programs understand what is expected of them when the term “science of reading” and similar terms are used in code.

The charts below demonstrate the terms used in both sets of regulations that, without definition, are prone to misuse, misinterpretation and misapplication.

13A.07.06 Programs for Professionally Licensed Personnel

Regulation Section	Terminology used in regulations to describe literacy instruction:
.08.State Program Approval Requirements C (1) (e)	Instruction in research-based literacy instruction aligned to the science of reading for the grade level the individual will be teaching
.08.State Program Approval Requirements C (2) (a)	Provide coursework demonstrating coverage of research-based literacy instruction aligned to the science of reading including phonemic awareness, phonics, vocabulary, fluency and comprehension;
.08.State Program Approval Requirements C (2) (b)	Use high-quality curricula and materials that accurately detail the principles of scientifically based reading practices;
.08.State Program Approval Requirements C (5) (b) (iv)	Include instruction in research-based literacy instruction aligned to the science of reading
.11.State Program Renewal, Oversight, and Revocation. A (6)	Beginning in the 2025-2026 school year, each approved educator preparation program leading to certification in early childhood education, elementary education, special education, and ESOL, shall post on its website information describing its program to prepare teachers to teach reading using evidence-based practices in literacy programming and instruction aligned to the science of reading

Regulation Section	Terminology used in regulations to describe literacy instruction:
.13 Teacher Preparation Competencies: Literacy Competencies B(1) (a)	Identify the component processes involved in reading and writing aligned to the science of reading
.13 Teacher Preparation Competencies: Literacy Competencies B(1) (d)	Identify characteristics that define evidence-based practices in literacy programming and instruction aligned to the science of reading
.13 Teacher Preparation Competencies: Literacy Competencies B(1) (e)	Use evidence-based criteria aligned to the science of reading to select and organize print and multimedia resources for teaching reading and writing; and
.13 Teacher Preparation Competencies: Literacy Competencies B(2) (i)	Identify the role of classroom literacy instruction aligned to the science of reading in a multi-tiered system of supports and work with colleagues to provide effective interventions for students who struggle as readers and writers; and
.13 Teacher Preparation Competencies: Literacy Competencies B(4)	Researched-based (sic) literacy instruction aligned to the science of reading to include:

13A.12.01-.07 Educator Licensure

Regulation Section	Terminology used in regulations to describe literacy instruction:
13A.12.02 Teachers .06 D	Special Provision: Beginning on July 1, 2025, all teachers employed in a Maryland local school system, State-operated school, or nonpublic school approved under COMAR 13A.09.10, in a position that requires a license in early childhood education, elementary education, special education, or English to Speakers of Other Languages shall demonstrate proficiency in the knowledge and practices of scientific reading instruction, to include phonemic awareness, phonics, fluency, vocabulary, and comprehension , as follows:
13A.12.02 Teachers .06 D (1) (d)	Completion of training provided by the Department in the science of reading for the purpose of fulfilling the requirements of renewal.
13A.12.02 Teachers .06 D (2)	A license holder required to demonstrate proficiency in the knowledge and practices of scientific reading instruction shall present the requirement in Section D(1) of this regulation when renewing a license, as follows:
13A.12.02 Teachers .06 D (3)	A license holder is considered proficient in the knowledge and practices of scientific reading instruction when the requirements of this section have been submitted.
13A.12.02 Teachers .06 D (4)	The Department shall ensure this license indicates that a license holder is proficient in the knowledge and practices of scientific reading instruction .
13A.12.02 Teachers .07 A (2)(c)	For special education, 24 credits, at least 12 of which are in the age-appropriate area of special education and 12 of which are in related areas or researched-based (sic) literacy instruction aligned to the science of reading

Regulation Section	Terminology used in regulations to describe literacy instruction:
13A.12.02 Teachers .07 B (1)	To receive an endorsement in Elementary Education, Early Childhood Education, English for Speakers of Other Languages, and Special Education, an educator shall qualify under Section A of this regulation and demonstrate proficiency in the knowledge and practices in scientific reading instruction, to include phonemic awareness, phonics, fluency, vocabulary, and comprehension , by:
13A.12.02 Teachers .07 B (1)(b)	Completion of coursework or professional learning approved by the Department, and provided by a Department-recognized partner approved to deliver Instruction in the science of reading :
13A.12.02 Teachers .07 B (1)(d)	Completion of training provided by the Department in the science of reading for the purpose of fulfilling the requirements of renewal.
13A.12.04 Specialists .06 E (1)	An applicant who satisfies the requirements of Section A of this regulation by presenting a teaching license in a secondary education are shall demonstrate proficiency in the knowledge and practices of scientific reading instruction, to include phonemic awareness, phonics, fluency, vocabulary, and comprehension ,
13A.12.04 Specialists .06 E (2) (d)	Completion of training provided by the Department in the science of reading .
13A.12.04 Specialists .07 B (1)	An applicant who satisfies the requirements of Section A(1) of this regulation by presenting a teaching license in a secondary education are shall demonstrate proficiency in the knowledge and practices in scientific reading instruction, to include phonemic awareness, phonics, fluency, vocabulary, and comprehension .
13A.12.04 Specialists .07 B (2) (d)	Completion of training provided by the Department in the science of reading .

DISCUSSION

Science of Reading Definition, The Reading League.

In 2019, [The Reading League convened a group of educators and researchers to write a definition of “science of reading”](#) as well as a [Defining Guide](#) to help school administrators, educators, and parents understand what is, and is not aligned to the science of reading.

The Reading League defines the **science of reading** as:

“The science of reading is a vast, interdisciplinary body of scientifically-based research about reading and issues related to reading and writing.

The research has been conducted over the last five decades across the world, and it is derived from thousands of studies conducted in multiple languages. The science of reading has culminated in a preponderance of evidence to inform how proficient reading and writing develop; why some have difficulty; and how we can most effectively assess and teach and,

therefore, improve student outcomes through prevention of and intervention for reading difficulties.”

The term science of reading refers to a body of knowledge but does not define what or how to teach reading.

Literacy Definitions, The Virginia Literacy Act, .

The text of The Virginia Literacy Act (2022) defined two terms, “**Science-based reading research**” and “**Evidence-based literacy instruction.**” Together, these two terms describe the research on how children learn to read as well as how to instruct children to read in the classroom.

Science-based reading research - research that

(i) applies rigorous, systematic, and objective observational or experimental procedures to obtain valid knowledge relevant to reading development, reading instruction, and reading and writing difficulties, and

(ii) explains how proficient reading and writing develop, why some children have difficulties developing key literacy skills, and how schools can best assess and instruct early literacy, including the use of evidence-based literacy instruction practices to promote reading and writing achievement.

Evidence-based literacy instruction structured instructional practices, including sequential, systematic, explicit and cumulative teaching, that

(i) are based on reliable, trustworthy, and valid evidence consistent with science-based reading research,

(ii) are used in core or general instruction, supplemental instruction, intervention services, and intensive intervention services,

(iii) have a demonstrated record of success in adequately increasing students’ reading competency, vocabulary, oral language, and comprehension and in building mastery of the foundational reading skills of phonological and phonemic awareness, alphabetic principle, phonics, spelling, and text reading fluency; and

(iv) are able to be differentiated in order to meet the individual needs of students.

Structured Literacy, International Dyslexia Association (IDA)

The IDA first used the term structured literacy in 2014. In some documents MSDE has used this term. Structured literacy has been defined as: pu

“Structured literacy approaches emphasize highly explicit and systematic teaching of all important components of literacy. These components include both foundational skills (e.g., decoding, spelling) and higher-level literacy skills (e.g., reading comprehension, written expression). SL also emphasizes oral language abilities essential to literacy development,

including phonemic awareness, sensitivity to speech sounds in oral language, and the ability to manipulate those sounds.”

We strongly recommend that the regulations use consistent terminology that is defined in the regulations. Such as The Reading League’s science of reading term and definition and incorporate the The Reading League’s Defining Guide by reference. Alternatively, PSTEB and the State Board of Education could adopt the Virginia terminology and definitions of “Science Based Reading Research” and “Evidence Based Literacy Instruction” in these regulations, where appropriate.

2) Early Literacy Competencies (COMAR 13A.07.06 Programs for Professionally Licensed Personnel)

RECOMMENDATION: The early literacy competency section (Section .13B) should closely match the Maryland Elementary Literacy Competency document, and that document and the coursework should be incorporated into the regulations by reference.

The competencies serve as a roadmap for teacher preparation programs because they outline what the State Board of Education expects new teachers to know.

In place of the existing early literacy competencies in the draft regulation, we suggest the following:

B. Literacy Competencies for Early Childhood, Elementary, Special Education and English to Speakers of Other Languages. Teacher candidates completing programs that lead to licensure in early childhood, elementary, English to speakers of other languages, and special education areas shall demonstrate an understanding of the following:

- (1) *Literacy Processes. The teacher candidate shall*
 - (a) *Identify the component processes involved in reading and writing;*
 - (b) *Apply that knowledge to understand the reading and writing processes of native English speakers and English learners;*
 - (c) *Describe how key components of reading and writing processes develop and what biological, cognitive, linguistic and sociocultural factors may influence literacy development;*
 - (d) *Identify characteristics that define evidence-based practices in literacy programming and instruction aligned to the science of reading and writing;*
 - (e) *Use evidence-based criteria aligned to the science of reading to select and organize print and multimedia resources for teaching reading and writing; and*
 - (f) *Use a variety of print and multimedia resources to engage students as reading and writers.*

- (2) *Literacy Instruction in the Diverse Classroom. The teacher candidate shall:*
 - (a) *Provide instruction focused on the core components of reading that lead to proficient and motivated reading behavior for all students;*
 - (b) *Provide instruction focused on the core components of writing that lead to proficient and motivated writing behavior for all students;*
 - (c) *Design speaking and listening opportunities that lead to more active, equitable*

- and academically oriented conversations for all students; and*
- (d) *Identify the role of classroom literacy instruction in a multi-tiered system of supports and work with colleagues to provide effective interventions for students who struggle as readers and writers.*
- (3) *Effective Literacy Assessment. The teacher candidate shall:*
- (a) *Identify the foci, purposes and features of literacy assessments and application;*
- (b) *Select or design appropriate literacy assessments and use data from those assessments to make valid educational decisions, differentiate instruction, collaborate with instructional specialists, and evaluate the effectiveness of literacy instruction; and*
- (c) *Use effective techniques for communicating assessment information to a variety of stakeholders.*

EXPLANATION:

The draft literacy competencies in these regulations are a good start; but they lack the coherence of succinctly-written and comprehensive competencies adopted by other states.

In March 2020, after 5 years of work, the MSDE-supported [Maryland Elementary Literacy Work Group](#) released the **“Maryland Elementary Literacy Competencies.”** The Work Group developed literacy standards carefully aligned to national standards and evidence-based reading research to redesign Maryland’s existing elementary literacy program to include 14 literacy competencies organized into 48 organizing principles.

The Reading League Maryland’s Policy Committee members carefully cross-referenced the Maryland Elementary Literacy Competencies with the Early Literacy Competencies in these proposed regulations (Section .13B). While each of the competencies are listed in the draft regulations, they are not structured or coherent like those in the Work Group’s competencies.

For example:

1. The Early literacy section of the regulations is divided into three competency sections and one “catch-all” section B(4):
 - a. B(1) Literacy Processes,
 - b. B(2) Literacy Instruction in the Diverse Classroom, and
 - c. B(3) Effective Literacy Assessment, and
 - d. B(4) Researched-based literacy instruction aligned to the science of reading, to include:”

Each of the subheadings under B(4) are misplaced and should be listed under one of the sections B(1) - B(3) to align with the Maryland Elementary Literacy Competencies document.

2. There is inconsistency in some of the subheadings. For example, some list competencies and some subheadings list organizing principles. These should be consistent.
3. Lines B(2)(a) through B(2)(f) do not match any of the competencies or organizing principles in the Maryland Elementary Literacy Competencies.. Subheadings B(2)(a) through B(2)(f) roughly align to organizing principles under Competency 7, but they appear to have been re-written and use language that does not match the competencies or organizing principles. This is concerning because the regulatory language includes balanced literacy jargon and

doesn't follow the well-researched, evidence-aligned terminology used in the competencies developed by the Workgroup.

4. The draft regulations include a newly introduced organizing principle that includes reading screening, but it incorrectly describes screeners as instruments that identify skill gaps. Most screeners are short quick assessments that measure whether a student is "at risk" for reading difficulty. Diagnostic instruments identify skill gaps. [See this IES infographic about reading assessments.](#)

3) National Board Certification (COMAR 13A.12.01-.07 Educator Licensure)

RECOMMENDATION 1

The new National Board Certification regulatory language MSDE plans to present could be an effective temporary solution until the National Board revises its standards and criteria for National Board Certification to align with the current evidence on how children learn to read. Please refer to our letter to the National Board on this topic dated August 8, 2023.

RECOMMENDATION 2

We recommend the science of reading loophole in the teacher licensure regulations be closed. Out-of-state licensure candidates who hold a National Board Certificate, and are seeking a license in elementary education, early childhood education, special education or English to Speakers of Other Languages, should also be required to submit a passing score on a reading instruction test. National Board Certification should not exempt an out-of-state candidate from demonstrating that s/he is able to teach children to read in a manner that is aligned to the science of reading.

EXPLANATION

In a [July 2023 memorandum](#), MSDE Superintendent Choudhury recognized and took action to strengthen the national board certification pathway. We agree with and support Mr. Choudhury's decision to propose regulations to require a science-aligned portfolio for National Board Certification for the following areas:

- a) Literacy: Reading Language Arts,
- b) Exceptional Needs,
- c) Early Childhood Generalist,
- d) Middle Childhood Generalist, and/or
- e) English as a New Language

National Board Certification does not require candidates to possess the knowledge and skills to teach reading using instruction and practices aligned to the science of reading.