



Karen B. Salmon, Ph.D.
State Superintendent of Schools

TO: Members of the State Board of Education
FROM: Karen B. Salmon, Ph.D.
DATE: June 20, 2018
SUBJECT: COMAR 13A.12.01.05
General Requirements for Professional Certificates
ADOPTION

PURPOSE:

The purpose of this item is to request adoption of the amendments to Code of Maryland Regulations (COMAR) 13A.12.01.05 *General Requirements for Professional Certificates*. Amendments were proposed to allow those individuals seeking certification who do not hold a bachelor's degree (i.e. specialized professional areas and professional technical education candidates) to have the ability to present credit bearing coursework to fulfill the basic skills requirement in lieu of an assessment.

REGULATION PROMULGATION PROCESS:

Under Maryland law, a state agency, such as the State Board of Education (SBOE), may propose a new regulation whenever the circumstances arise to do so. The SBOE shares joint authority with the Professional Standards and Teacher Education Board (PSTEB) to develop regulations governing teacher certification and preparation. When the SBOE initiates a regulatory change concerning certification, the PSTEB must review the proposed regulation. If a majority of the PSTEB members approve of the regulation, the regulation promulgation process continues. If a majority of the PSTEB members disapprove of the proposed regulation, the regulation will not move forward unless approved by a super-majority of the SBOE (three-fourths of its members).

After the PSTEB has voted to approve the regulation (or three-fourths of the State Board has voted to approve the regulation despite the PSTEB's disapproval), the proposed regulation is sent to the Administrative, Executive, and Legislative Review Committee (AELR) for a 15-day review period. If the AELR Committee does not hold up the proposed regulation for further review, it is published in the Maryland Register for a 30-day public comment period. At the end of the comment period, Maryland State Department of Education (MSDE) staff reviews and summarizes the public comments, which are presented to the PSTEB and the State Board. Thereafter, MSDE staff will present a recommendation to the State Board to either: (1) adopt the regulation in the form it was proposed; or (2) revise the regulation and adopt it as final because the suggested revision is not a substantive change; or (3) revise the regulation and re-propose it because the suggested revision is a substantive change. At any time during this process, the AELR Committee may stop the promulgation process and hold a hearing. Thereafter, it may recommend to the Governor that the regulation not be adopted as a final regulation or the AELR Committee may release the regulation for final adoption. The State Board, as the originating board, would then vote to formally adopt the regulation.

HISTORICAL BACKGROUND:

During the 2015 Maryland legislative session, Washington County Public Schools sponsored Senate Bill 635, State Board of Education and the Professional Standards and Teacher Education Board – Alternative Certification Programs, requiring the SBOE and the PSTEB to consider and, if appropriate, develop an alternative teacher certification program for areas of the State experiencing a critical teacher shortage by December 1, 2015. In response to this legislation, a work group was established and recommendations were ultimately made. The work group examined the renewal requirements of the conditional certificate due to concerns pertaining to potential barriers for those individuals seeking certification in the area of Professional and Technical Education (PTE).

Given the alignment and timing of this charge with the creation of the Teacher Induction, Retention, and Advancement Act (TIRA), it was decided to incorporate the examination of the conditional certificate renewal requirements into the work of the TIRA work group. A subcommittee was established and charged with reviewing the conditional certificate renewal requirements, which includes testing requirements.

The committee found that local school systems are not only having difficulty recruiting, but losing specialized professional area teachers and PTE teachers due to their inability to achieve professional certification. Workgroup and committee members heard public testimony from three individuals, and received letters from Montgomery, Carroll, and Charles County Public Schools, as well as, the Maryland House of Delegates Legislative District 35B, Cecil and Harford Counties, that addressed the challenges of staffing PTE teachers in Maryland public schools. It was reported that PTE teacher candidates often have difficulty passing basic skills assessments.

As a result of public and written testimony and critical teacher shortages in many of these areas, the committee recommended that it is in the best interest of Maryland students to examine alternative measures of basic skills for those who do not test well but have demonstrated success in the classroom as conditionally certified teachers.

The State Board granted permission to publish this regulation at the January 30, 2018 State Board meeting. On February 1, 2018, the PSTEB granted permission to publish the proposed amendments to COMAR 13A.12.01.05 *General Requirements for Professional Certificates*. On April 27, 2018, the proposed regulations were published in the Maryland Register (Attachment I) through May 29, 2018. The MSDE received ten public comments which are summarized in the attached chart (Attachment II).

Based on the comments received, the MSDE is not making any recommended changes to COMAR 13A.12.01.05 *General Requirements for Professional Certificates* because all teachers in Maryland are required to demonstrate mastery of basic math, reading, and writing skills. The proposed regulation allows an alternative measure for applicants who do not hold a post-secondary degree. Furthermore, some comments appear to refer to COMAR 13A.12.02.15 Professional Technical Education transcript analysis requirements. These regulations are not currently open for comment; the MSDE is undertaking a comprehensive review of all certification requirements and will consider these comments moving forward.

SUMMARY:

Proposed amendments to COMAR 13A.12.01.05 allow those individuals seeking certification who do not hold a bachelor's degree (i.e., specialized professional areas and professional technical education candidates) to have the ability to present three semester hours of credit bearing coursework in math and English Language Arts to fulfill the basic skills requirement in lieu of an assessment.

Members of the State Board of Education

June 20, 2018

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ACTION:

Request adoption of amendments to COMAR 13A.12.01.05 *General Requirements for Professional Certificates*.

Attachment

professional certificate, if the requirements under Regulation .08-1 of this chapter are satisfied.

KAREN B. SALMON, Ph.D.
State Superintendent of Schools

bearing course work, with a grade of C or better, in English language arts.

E. (text unchanged)

KAREN B. SALMON, Ph.D.
State Superintendent of Schools

Subtitle 12 CERTIFICATION

13A.12.01 General Provisions

Authority: Education Article, §§2-205, 2-303(g), and 6-701—[6-705] 6-706, Annotated Code of Maryland

Notice of Proposed Action

[18-109-P]

The Maryland State Board of Education proposes to amend Regulation .05 under **COMAR 13A.12.01 General Provisions**. This action was considered at the January 30, 2018, meeting of the State Board of Education and the February 1, 2018, meeting of the Professional Standards and Teacher Education Board.

Statement of Purpose

The purpose of this action is to allow those individuals seeking certification in professional and technical education who do not hold a bachelor's degree to have the ability to present credit-bearing course work to fulfill the basic skills requirement in lieu of an assessment.

Comparison to Federal Standards

There is no corresponding federal standard to this proposed action.

Estimate of Economic Impact

The proposed action has no economic impact.

Economic Impact on Small Businesses

The proposed action has minimal or no economic impact on small businesses.

Impact on Individuals with Disabilities

The proposed action has no impact on individuals with disabilities.

Opportunity for Public Comment

Comments may be sent to Sarah Spross, M.Ed., Assistant State Superintendent, Division of Educator Effectiveness, Maryland State Department of Education, 200 West Baltimore Street, Baltimore, Maryland 21201, or call 410-767-0385 (TTY 410-333-6442), or email to sarah.spross@maryland.gov, or fax to 410-333-8963. Comments will be accepted through May 29, 2018. A public hearing has not been scheduled.

Open Meeting

Final action on the proposal will be considered by the State Board of Education during a public meeting to be held on June 19, 2018, 9 a.m., at 200 West Baltimore Street, Baltimore, Maryland 21201.

.05 General Requirements for Professional Certificates.

A.—C. (text unchanged)

D. Exceptions. An applicant who does not possess a bachelor's or higher degree for certification in a [career] *professional* and [technology] *technical* education area or a *specialized professional area* which does not require a bachelor's degree is required to submit:

(1) [evidence] *Evidence* of qualifying scores as established by the State Superintendent of Schools on [the] *a basic skills* teacher certification [tests] *test* approved by the State Board of Education[.]; or

(2) *3 semester hours of credit-bearing course work, with a grade of C or better, in math content and 3 semester hours of credit-*

Subtitle 12 CERTIFICATION

13A.12.01 General Provisions

Authority: Education Article, §§2-205, 2-303(g), and 6-701—[6-705] 6-706, Annotated Code of Maryland

Notice of Proposed Action

[18-110-P]

The Maryland State Board of Education proposes to adopt new Regulation .08-1 under **COMAR 13A.12.01 General Provisions**. This action was considered at the February 27, 2018, meeting of the State Board of Education and at the February 1, 2018, meeting of the Professional Standards and Teacher Education Board.

Statement of Purpose

The purpose of this action is to provide local education agencies the ability to request an adjunct certificate for individuals with highly specialized content expertise who are interested in teaching on a part-time basis.

Comparison to Federal Standards

There is no corresponding federal standard to this proposed action.

Estimate of Economic Impact

The proposed action has no economic impact.

Economic Impact on Small Businesses

The proposed action has minimal or no economic impact on small businesses.

Impact on Individuals with Disabilities

The proposed action has no impact on individuals with disabilities.

Opportunity for Public Comment

Comments may be sent to Sarah Spross, M.Ed., Assistant State Superintendent, Division of Educator Effectiveness, Maryland State Department of Education, 200 West Baltimore Street, Baltimore, Maryland 21201, or call 410-767-0385 (TTY 410-333-6442), or email to sarah.spross@maryland.gov, or fax to 410-333-8963. Comments will be accepted through May 29, 2018. A public hearing has not been scheduled.

Open Meeting

Final action on the proposal will be considered by the State Board of Education during a public meeting to be held on June 19, 2018, 9:30 a.m., at 200 West Baltimore Street, Baltimore, Maryland 21201.

.08-1 Adjunct Certificate.

A. *The Maryland State Department of Education may issue an adjunct certificate upon the request of a local school system superintendent or an education director of a nonpublic school approved under COMAR 13A.09.10.*

B. *The request for adjunct certification must include:*

(1) *The name and credentials of the individual;*

(2) *The course name and content to be taught; and*

(3) *An explanation as to why the position cannot be filled by a qualified certificate holder.*

C. *The Adjunct Certificate is nontransferrable between local school systems.*

COMAR 13A.12.01.05 - Comments Submitted

Commenter(s)	Comment	MSDE Comment
<p>Alisha Marchewka Baltimore City School Teacher and Parent</p>	<p>These regulations will make it easier for districts and schools to hire untrained, uncertified ‘artists’ to teach children, rather than certified art teachers in an effort to save money. I implore the Maryland State Board of Education to consider that Art Teachers ARE in fact ARTISTS that chose to teach children, and went to college to gain the appropriate training to do so because of their passion to work with youth.</p> <p>I am afraid that these regulations will be a pathway for schools to push out ‘more expensive’, trained art teachers and hire ‘less expensive’, uncertified, part time, adjunct artists instead. This will ultimately hurt our children’s art education the most. They will not have the quality, scaffolded arts education they deserve from certified, experienced arts teachers.</p> <p>I ask that you consider vetoing these regulations. They are not good for children. They are not good for teachers. And they are not good for the future of the arts in Maryland.</p>	<p>This comment, although listed as comment for COMAR 13A.12.01.05, does not appear to reference the proposed regulation.</p>
<p>Karen Howard Baltimore City School Teacher</p>	<p>I have been a visual art teacher in Baltimore City Schools for thirteen years. City art teachers are a diverse group of highly educated and dedicated professionals that are being betrayed by a water down approach to education. This back-door approach to certification offered in the COMAR changes is an offense to all Highly Qualified art teachers. If an adjunct instructor or professional artist wishes to teach in K-12 then they have the option to earn a degree and begin their career.</p> <p>Using adjuncts and professional artist to teach the Fine Arts devalues the k-12 model of education. This plan betrays the students who are most in need. The students who frequently need the most help. The poor and students of color. Rather than continue to offer the best to these students, your proposed "Changes to COMAR" instead takes power away from the practitioners of K-12 education, teachers and researchers. It creates an ugly hierarchy within education that mirrors the increasingly gross divide within American society. The only reason to do so is to hire teachers for less pay.</p> <p>Our school systems have become increasingly reliant upon temporary and disposable teachers. This approach is designed to violate the actual goals of learning, which are charged to the teacher and researcher. The work I do is important, it's what I was trained to do. I ask that you consider vetoing these regulations. They are not good for children. They are not good for teachers. And, they are not good for the future of the arts in Baltimore City or Maryland.</p>	<p>This comment, although listed as comment for COMAR 13A.12.01.05, does not appear to reference the proposed regulation.</p>

<p>Lawrence A. Shulman Senior Counsel Shulman Rogers</p> <p>Tony Crane Owner Efficient Home LLC</p> <p>Mark Drury VP Business Development Shapiro & Duncan, Inc.</p> <p>Dr. Marshall Greenblatt President Marian Greenblatt Education Fund</p> <p>Joe Kessler Managing Partner Next-Stage Development Group M. Jane Markley, RN, Med, FACHE President M. Jane Markley Consulting LLC</p> <p>Howard Menditch Partner and Managing Member Menditch Homes, LLC</p> <p>Rob Minnick President Minnick's, Inc.</p> <p>John O'Donnell President & CEO W ANADA</p> <p>Harold Redden Vice President</p>	<p>The proposed regulatory changes are a welcome start, but they fall far short of what we need. We should not be turning away automotive technicians, pilots, carpenters, IT professionals, plumbers, or nurses who want to teach in our schools and are already licensed under state law in their occupations. Yet, the proposed regulatory changes would still require these professionals to jump through another hoop. They would be required to either:</p> <p>(a) pass the PRAXIS or another standardized test for teacher certification; or</p> <p>(b) complete 3 semester hours of credit-bearing course work, with a grade of C or better, in math content and 3 semester hours of credit-bearing course work with a grade of C or better, in English language arts.</p> <p>We strongly propose adding clear language to COMAR that neither of these alternatives is required for an individual who already is licensed to work in the specific career content area in which they want to teach.</p>	<p>All teachers in Maryland are required to demonstrate mastery of basic math, reading and writing skills. The proposed regulation allows an alternative measure for applicants who do not hold a post secondary degree.</p>
<p>Montgomery County Chamber of</p>	<p>It is our hope that the State supports automotive technicians, pilots, carpenters, IT</p>	<p>This comment, although</p>

<p>Commerce (MCCC)</p>	<p>professionals, plumbers, or nurses, who are licensed in their current occupation, and who want to teach in our schools. Unfortunately, the state's long-standing teacher certification requirements inhibit those efforts by impeding schools from hiring experienced career professionals to teach students in their areas of expertise. In addition, the proposed changes would add an adjunct certification option for career professionals. As proposed, this option applies only to individuals who hold a bachelor's degree, so it excludes the whole range of professionals, such as plumbers and HVAC experts, who have real-world experience in their occupations, even if they have not graduated from college. Unless the aforementioned provisions are amended, Maryland will unnecessarily perpetuate the obstacles that are contributing to critical shortages in career and technical education teachers. By removing these obstacles, and not creating additional barriers, we ensure access to talent which will meet employers' needs in a regional, national, and global economy</p>	<p>listed as comment for COMAR 13A.12.01.05, does not appear to reference the proposed regulation.</p>
<p>Kimberly Hill, Superintendent-Charles County Public Schools</p>	<p>On behalf of Charles County Public Schools, we would like to add our support to the position of PSSAM provided in the May 15 letter from PSSAM President Dr. D'Ette Devine.</p> <p>Heating, Ventilation and Air Conditioning Our instructor for Heating, Ventilation, and Air Conditioning is also the team leader for our CTE programs at the Robert D.Stethem Educational Center. He holds a Master HVAC Certification and is a certified instructor through NCCER and in Solar Energy. In addition to teaching at Stethem, he is the Acting Director at the Center for Employment Training in Alexandria Virginia, a trade skills job-training program for adults. He has over 30 years of experience in the HVAC Trade and more than 20 years of teaching experience. Because he is unable to pass the Praxis Writing portion, our instructor is a long-term substitute. Additionally, he does not qualify for health benefits. One of his students won a silver medal at the Skills USA Maryland State Championships. From this, he has secured a job in the trade from a local company. One has been accepted into Virginia Apprentice School: a trade's continuing education program. All of the students have received one or more of the certifications in the program. Nine students currently have internships in the HVAC industry. He coordinates a very active Program Advisory Council that make meaningful connections for students and ensure that the program is industry aligned.</p> <p>Automotive Technology Our Automotive Technology instructor is an ASE Certified Master Mechanic with 40 years of experience in the industry. He is an adjunct professor with the Prince Georges County Community College. Our instructor is a long-term substitute. He does not qualify for health</p>	<p>All teachers in Maryland are required to demonstrate mastery of basic math, reading and writing skills. The proposed regulation allows an alternative measure for applicants who do not hold a post secondary degree.</p>

	<p>benefits. All of his students have received one or more certifications that are aligned to the industry. He has added a high level of rigor to the courses and positively impacted the program by creating career connections and achieving National Automotive Technician Education Foundation (NATEF) certification for the program, instructor and students.</p> <p>Culinary Arts Our instructor for Culinary Arts is a graduate of the Pennsylvania Institute of Culinary Arts/Le Cordon Bleu. He has more than 25 years of experience as an Executive Chef. He was instrumental in getting the Culinary Arts program American Culinary Federation (ACF) certified. He is currently an ACF Certified Executive Chef and an ACF Certified Culinarian and an ACF Certified Secondary Culinary Educator. Our instructor spent two years on the conditional teacher pay scale. He took a significant pay cut to assume this role. He took the Praxis Core thirteen times; covering the cost of the test himself. He has finally passed however, he would have had to resign at the end of this year if he did not pass and was able to achieve teacher certification and pay.</p> <p>Collision Repair Our Instructor for Collision Repair has 26 years of experience in the Auto Industry. He is the owner of a successful Collision Repair business. He is ASE Master Certified, and holds 15 i-Car Curriculum Training Certifications. He is Environmental Protection Agency (EPA) 40 CFR Certified. He is Universal Certified for HVAC & Refrigerant from Penn State University. He holds the highest level of certification with Pittsburgh Plate Glass (PPG) for automotive refinishing. He is a first-year teacher that is on the conditional pay scale until he passes four education courses and the Praxis Core in Reading, Writing and Math. He is approaching the end of his first year and is very concerned about the feasibility of him being able to complete all of the requirements in the specified timeframe. In addition to teaching new courses and getting acclimated to the educational environment, he has to prepare to take college courses and pass the required exams.</p> <p>We strongly believe that alternate standards should be adopted for the instructors in our CTE programs that are focused on certifications and experience in their field. We urge you to review the current COMAR standards with an eye towards expanding the eligibility of quality instructors by valuing their expertise and real world experience that is vital for our students to be successful in the field.</p>	
Jack Smith, Superintendent- MCPS	On behalf of Montgomery County Public Schools (MCPS), we would like to add our support	All teachers in Maryland

	<p>to the position of the Public Schools Superintendents Association of Maryland (PSSAM). MCPS previously has urged the Maryland State Department of Education to address this issue. While we welcome the proposed changes to the Code of Maryland Regulations (COMAR) that currently are pending, we do not think they go far enough to address the certification hardships experienced by some of our Career and Technical Education (CTE) teachers. Below we provide a number of specific examples for your consideration.</p> <p>Heating Ventilation and Air Conditioning An individual was hired to serve as a teacher in the Heating, Ventilation, and Air Conditioning (HVAC) program. This individual held industry certification, and was highly successful in his career, but he wanted to give back to the community by serving as a teacher. He was hired with a provisional license and allowed two years to complete all the certification requirements. He was highly successful in his instruction of the students in the HVAC courses. In fact, under his leadership, students achieved at higher levels, completing more industry certifications than earned under the instruction of all prior HVAC teachers, and the enrollment in the program increased. However, he was unsuccessful at passing the required Praxis exam. The fact that students achieved at higher levels and enrollment increased, as well as his industry certification and state licensure, should have been sufficient to validate his status as a successful teacher. Passing the Praxis exam is unattainable for many prospective, and otherwise skilled and qualified, CTE teachers. In recognition of the skills gap in today's workforce, the community desperately needs industry professionals to lead CTE education.</p> <p>Cosmetology A Licensed Senior Cosmetologist is serving as an instructor for one of the Cosmetology programs. She entered MCPS directly from the industry. Unfortunately, she also was unsuccessful in passing the required Praxis exam. She has been out of school and working in the industry for many years. After months of tutoring, she was able to pass the reading and English sections of the Praxis exam; however, she has had major difficulties in passing the math section. Because of her desire to continue to teach the students she serves, her only option is to serve as a long-term substitute. While serving as a Cosmetology instructor, she has increased enrollment in the program and enabled many students to finish the program and pass the state boards to become licensed cosmetologists. The instructor's ability to teach and equip students with the skills needed to be successful in this industry does not rest on her ability to do higher level math. Her ability to teach, motivate, and equip students with skills needed for postsecondary success has been evident. It would be extremely</p>	<p>are required to demonstrate mastery of basic math, reading and writing skills. The proposed regulation allows an alternative measure for applicants who do not hold a post secondary degree.</p> <p>The coursework, experience, and industry licensure requirements for PTE teachers are found in 13A12.02.15, which is not currently open for comment. MSDE is currently undertaking a comprehensive review of all certification requirements and will consider these comments as we move forward.</p>
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	<p>unfortunate for MCPS to lose a highly qualified licensed instructor, because of the Praxis exam requirement.</p> <p>Health Professions Two registered nurses and a nurse practitioner, hired two years ago to teach courses in our Academy of Health Professions at Thomas Edison High School of Technology and Watkins Mill High School, were required to take four teacher certification courses, as well as the Praxis exam, during their first two years. This was a challenge for three reasons:</p> <p>(1) As a new teacher, planning and collaborating and teaching is a large task; the additional time and workload of taking a course every semester made this very difficult.</p> <p>(2) The teachers signed up to take courses, and the universities dropped the courses at the start of semesters; at that point, finding another course that fulfilled the requirements was not always possible.</p> <p>(3) Preparing for a Praxis exam also takes significant time. For this reason, the Praxis exam only adds to the burden of taking teacher certification courses.</p> <p>MCPS strongly encourages the Maryland State Department of Education to take the straightforward path proposed by PSSAM of simply accepting an individual's successful completion of licensing requirements under state law as sufficient for certification to teach in that individual's career area of expertise. Highly experienced and master certified individuals willing to leave the industry to teach high school students are difficult to find. We urge you to review the current COMAR standards to place a higher value on industry expertise to secure quality instructors for our students' successful futures.</p>	
D'Ette Devine, President PSSAM	We applaud the intent of these proposed changes to expand opportunities to promote career readiness among our state's students. Nevertheless, we believe that the proposed changes do not go far enough to reduce barriers to entry for hiring talented career professionals. To the contrary, they impose new requirements that may, in fact, be counterproductive. In our view, there should be absolutely no bar to hiring experienced	All teachers in Maryland are required to demonstrate mastery of basic math, reading and writing skills. The

	<p>career professionals, who are already licensed under state law in their occupations, to educate our students in their fields of expertise; for example, a plumber, licensed by the State Board of Plumbing, or a Heating, Ventilation, Air Conditioning and Refrigeration (HY AC) expert, licensed by the State Board of Heating, Ventilation, Air Conditioning and Refrigeration. Yet, it is increasingly difficult to provide our students the opportunity to benefit from real-world experiences from such individuals, if they are also required to pass standardized tests, such as the PRAXIS, and meet other certification standards applicable to teachers' academic subject matter.</p> <p>The proposed COMAR revisions are flawed in at least three critical ways: 1) The proposed changes to COMAR 13A.12.01.05 (General Requirements for Professional Certificates) do not take the straightforward path of simply accepting an individual's successful completion of licensing requirements under state law as sufficient for certification to teach in that individual's career area of expertise. While the proposed changes do provide an alternative to passing the PRAXIS, the option sets a very high bar. Specifically, the proposed alternative requires 3 semester hours of credit-bearing course work with a grade of C or better in math content, and 3 semester hours of credit-bearing course work with a grade of C or better in English language arts. This requirement would be difficult to fulfill for many successful professionals in fields such as HVAC and plumbing, for example. It would be more appropriate to limit the criteria for career and technical education teachers to licensure and real-world experiences in the relevant fields, which typically provide as much applied mathematics, problem-solving, and reading and writing skills as any college courses.</p> <p>2) The proposed changes to COMAR 13A.12.01.05 (General Requirements for Professional Certificates) apply only to specialized professional areas that do not require a bachelor's degree. Again, this requirement is unnecessarily limiting. For example, a registered nurse must have a bachelor's degree in Maryland and, therefore, would not benefit from this change. This is counterproductive because we should welcome any registered nurse who wants to teach in a career pathway program rather than prohibiting her from being hired simply because she cannot either: (a) pass the PRAXIS, or (b) meet course hour and grade requirements in mathematics and English language arts. Accordingly, this alternative pathway to certification should be expanded to encompass all individuals who meet state licensure requirements in the specialized field of instruction, regardless of whether a bachelor's degree is required.</p> <p>3) The proposal to adopt COMAR 13A.12.01.08-1 (Adjunct Certificate) is even more</p>	<p>proposed regulation allows an alternative measure for applicants who do not hold a post secondary degree.</p> <p>The coursework, experience, and industry licensure requirements for PTE teachers are found in 13A12.02.15, which is not currently open for comment. MSDE is currently undertaking a comprehensive review of all certification requirements and will consider these comments as we move forward.</p>
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	<p>restrictive. The new provision is intended to create a one-year adjunct certificate to provide flexibility to place individuals with specialized content expertise in the classroom as teachers. Yet, the new provision is limited only to individuals who hold a bachelor's degree, so it cannot be applied to the whole range of professionals, such as plumbers and HVAC experts, who have a wealth of real-world experiences in their chosen profession, even if they have not graduated from college. Moreover, the proposed regulation was altered by the Professional Standards and Teacher Education Board (PSTEB) to limit these adjunct certificate positions to be part-time only. PSTEB's amendments would also require a professionally certified teacher to provide side-by-side coaching or co-teaching, which is a very resource-intensive proposition for school districts.</p>	
<p>D'Ette Devine, Superintendent-Cecil County Public Schools</p>	<p>On behalf of the Cecil County Public Schools, I would like to take this opportunity to support [PSSAM Letter] regarding proposed changes to the Code of Maryland Regulations (COMAR) that are currently pending.</p> <p>The current regulations have created barriers in effectively hiring instructors in Cecil County. Several welding instructors declined this position citing significant certification requirements. There are additional difficulties locating appropriate courses in a reasonable proximity.</p>	<p>All teachers in Maryland are required to demonstrate mastery of basic math, reading and writing skills. The proposed regulation allows an alternative measure for applicants who do not hold a post secondary degree.</p> <p>The coursework, experience, and industry licensure requirements for PTE teachers are found in 13A12.02.15, which is not currently open for comment. MSDE is currently undertaking a comprehensive review of all certification requirements and will consider these comments as we move forward.</p>

		Coursework in math and English, described in 13A.12.01.05D(2), may be found at the community college level as well as at four year institutions across the state.
Glenn Goetzinger, Controls Department Manager- Smith Mechanical	<p>The proposed regulations are a welcome start, but they fall short of what we need. We should not be turning away automotive technicians, pilots, carpenters, IT professional, plumbers, or nurses who want to teach in our schools and are already licensed under state law in their occupations. Yet, the proposed regulatory changes would still require these professional to jump through another hoop. They would be required to either:</p> <ul style="list-style-type: none"> (a) Pass the PRAXIS or another standardized test for teacher certification; or (b) Complete 3 semester hours of credit-bearing course work, with a grade of C or better, in math content and English Language Arts <p>We strongly propose adding clear language to COMAR that neither of these alternatives is required for an individual who is already licensed to work in the specific career content area in which they want to teach.</p>	All teachers in Maryland are required to demonstrate mastery of basic math, reading and writing skills. The proposed regulation allows an alternative measure for applicants who do not hold a post secondary degree.
Kelly Griffith, Superintendent- Talbot County Public Schools	<p>Support PSSAM’s position on the proposed changes. The current regulations have created artificial barriers in effectively hiring instructors for Career and Technology Pathway courses in Talbot County. Construction and Cabinet Making position was difficult to fill due to significant certification requirements. Our Automotive Technology Instructor is planning to retire soon and several potential instructors interested in the position are concerned about the significant certification requirements. There are additional difficulties locating appropriate courses in a reasonable proximity by being on the eastern shore.</p>	<p>All teachers in Maryland are required to demonstrate mastery of basic math, reading and writing skills. The proposed regulation allows an alternative measure for applicants who do not hold a post secondary degree.</p> <p>The coursework, experience, and industry licensure requirements for PTE teachers are found in 13A12.02.15, which is not currently</p>

		<p>open for comment. MSDE is currently undertaking a comprehensive review of all certification requirements and will consider these comments as we move forward.</p> <p>Furthermore, the statement about courses appears to reference a regulation that is not currently being amended. It is important to note that the courses required for PTE teachers may be found at the University of Maryland Eastern Shore.</p>
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