



Mohammed Choudhury  
State Superintendent of Schools

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**TO:** Members of the State Board of Education

**FROM:** Mohammed Choudhury, State Superintendent of Schools

**DATE:** July 26, 2022

**SUBJECT:** Waiver of COMAR 13A.12.01.07C(2) *Resident Teacher Certificate*

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**PURPOSE:**

The purpose of this item is to approve the State Superintendent’s recommendation for a waiver of Code of Maryland Regulation (COMAR) 13A.12.01.07C(2) *Resident Teacher Certificate* related to the requirements associated with the basic skills assessment.

**BACKGROUND/HISTORICAL PERSPECTIVE:**

The COMAR 13A.12.01.05A(3)(a) states that an applicant for a professional certificate shall meet the requirements established in the regulation, which may include teacher certification assessments approved by the State Board of Education (SBOE). Assessment requirements for professional certification are determined in policy and not explicitly stated in the regulation. In April 2019, the State Board of Education (SBOE) adopted a 3.0 Grade Point Average (GPA) as an approved basic skills assessment measure for those applying for a professional Maryland educator certificate (i.e., Standard Professional Certificate and Advanced Professional Certificate).

The COMAR 13A.12.01.07 *Resident Teacher Certificate* establishes the requirements for the issuance of the Resident Teacher Certificate, including a “qualifying score on an approved test in basic skills.” [COMAR 13A.12.01.07C(2)] The Resident Teacher Certificate is required for an individual who has enrolled in a Maryland-approved alternative educator preparation program to begin the residency phase of the program. Given that COMAR 13A.12.01.07C(2) requires a qualifying score on a basic skills test, individuals enrolled in alternative preparation programs must pass the test even when they have a 3.0 GPA. This extra requirement for Resident Teacher candidates to obtain a qualifying score on a basic skills test even when they have a 3.0 GPA, is having an adverse effect on the diversity of the MD teacher workforce.

Enrollment in alternative preparation programs is consistently more diverse than in traditional programs making alternative programs critical to the diversity of the Maryland teacher workforce. In 2020, Maryland alternative programs enrolled 937 candidates, 54% of whom were individuals of color. During the 2019-2020 school year alone, Maryland alternative preparation programs lost 15% of enrolled candidates who did not pass a basic skills test at the point of residency.

The Maryland State Department of Education (MSDE) is in the process of repealing and replacing COMAR 13A.12 *Educator Certification*, to include the use of a 3.0 GPA as an approved basic skills measure for **all** types of certificates including the Resident Teacher Certificate.

**EXECUTIVE SUMMARY:**

The Resident Teacher Certificate is a two-year certificate issued to an alternative program candidate in the residency phase of preparation. COMAR 13A.12.01.07C(2) requires the following to obtain the certificate:

*(1) Hold a bachelor or higher degree from an IHE;*

***(2) Obtain a qualifying score on a Department-approved test in basic skills or a comparable state-approved test in basic skills;***

*(3) Obtain a qualifying score on a Department-approved content area test or a comparable state-approved content test; and*

*(4) Present official documentation from the local superintendent of schools, or a Department-recognized head of an organization of nonpublic schools, of completion of standards-based pre-employment training that includes:*

*(a) A minimum of 90 hours of study that may consist of a combination of semester hours and clock hours and that are based on Maryland Essential Dimensions of Teaching or the Interstate New Teacher Assessment and Support Consortium standards and include:*

*(i) Elementary reading processes and acquisition; or*

*(ii) Secondary teaching reading in the content areas part I;*

*(b) Enrollment in a Department-approved alternative preparation program; and*

*(c) An internship which was part of a Department-approved alternative preparation program.*

In light of the request from Baltimore City Public Schools to allow alternative preparation program candidates to use a 3.0 GPA in lieu of a basic skills test to obtain a Resident Teacher Certificate, the State Superintendent of Schools recommends the State Board of Education grant the waiver of COMAR 13A.12.01.07C(2), collectively for all local education agencies, State-operated schools, and nonpublic schools approved under COMAR 13A.09.10 for good cause.

The waiver will be as follows:

COMAR 13A.12.01.07C(2)- *Obtain a qualifying score on a Department-approved **test** in basic skills or a comparable State-approved **test** in basic skills*

Effective July 26, 2022, a local education agency, State-operated schools, and nonpublic schools approved under COMAR 13A.09.10 may issue a Resident Teacher Certificate if the applicant meets the requirements established under COMAR 13A.12.01.07, to include a minimum overall GPA of 3.0 on their most recently earned degree or a qualifying score on a Department-approved basic skills assessment battery if the approved

alternative educator preparation program attests to the candidate's ability to serve as a resident on a Department-approved attestation form.

The State Board is authorized to grant the waiver pursuant to its authority under Education Article § 2-205 and COMAR 13A.01.01.02-1 Waiver from Regulations. The term of the waiver, if granted, is July 26, 2022, through July 25, 2025. Should COMAR 13A.12.01.07C(2) be amended or repealed during the term, the waiver will cease at that time.

**ACTION:**

Approve the State Superintendent's recommendation for a waiver of COMAR 13A.12.01.07C(2) *Resident Teacher Certificate* for all teachers employed with a local education agency, State-operated school, or nonpublic school approved under COMAR 13A.09.10 if the applicant meets the requirements established under COMAR 13A.12.01.07, to include a minimum overall GPA of 3.0 on their most recently earned degree or a qualifying score on a Department-approved basic skills assessment battery if the approved alternative educator preparation program attests to the candidate's ability to serve as a resident.



Kelly Meadows -MSDE- &lt;kelly.meadows@maryland.gov&gt;

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**Fwd: COMAR Waiver Request**

1 message

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**Ary Amerikaner -MSDE-** <ary.amerikaner@maryland.gov>  
To: Kelly Meadows -MSDE- <kelly.meadows@maryland.gov>

Wed, Jul 20, 2022 at 1:34 PM

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From: **Perkins-Cohen, Alison** <APerkins-Cohen@bcps.k12.md.us>  
Date: Wed, Jul 20, 2022 at 1:33 PM  
Subject: COMAR Waiver Request  
To: Ary Amerikaner -MSDE- <ary.amerikaner@maryland.gov>  
Cc: Brennan, Jim <JABrennan@bcps.k12.md.us>, Diehl, Sarah <SDiehl@bcps.k12.md.us>

Dear Ms. Amerikaner,

Like districts nationwide, Baltimore City Public Schools (City Schools) is experiencing a significant shortfall in filling critical teacher vacancies for the 2022-2023 school year. Despite beginning our recruitment process earlier and more aggressively than in past years, the national teacher shortage combined with a smaller pool of candidates from our teacher pipeline partner programs have resulted in a serious shortfall in filling our teacher vacancies. This situation has been worsened by the need to fill newly created teaching positions in high need areas, made possible by Kirwan funding.

COMAR 13A.12.01.07C(2) requires teacher candidates obtaining a Resident Teacher Certificate to pass a basic skills test (Praxis) in addition to a 3.0 grade point average, which further limits the number of pipeline program teachers available to the district.

City Schools therefore requests a waiver from COMAR 13A.12.07C(2), removing the Praxis requirement for the 2022-2023 school year. This waiver would apply to both new candidates and currently employed pipeline program teachers.

Please advise if you need any additional data to support this request. It goes without saying that the timeline for filling teacher vacancies is short and a timely response to this request would be greatly appreciated.

Thank you for your consideration.

Sincerely,

Alison

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13A.12.01.07

## **.07 Resident Teacher Certificate.**

### A. Definitions.

(1) In this regulation, the following terms have the meanings indicated.

(2) Terms Defined.

(a) "Comparable state-approved test" means an assessment, approved by a state certification agency, that tests proficiency in basic skill areas such as reading, writing, and mathematics or in content areas such as English, mathematics, science, and social studies, lists of which are maintained by the Department.

(b) "Clock hours" means hours devoted to instruction and preparation related to teaching, exclusive of internship hours.

B. The Resident Teacher Certificate shall be issued initially for 2 school years and may not be renewed.

C. Except as provided in §D of this regulation, an applicant for a Resident Teacher Certificate shall meet all of the following requirements:

(1) Hold a bachelor or higher degree from an IHE;

(2) Obtain a qualifying score on a Department-approved test in basic skills or a comparable state-approved test in basic skills;

(3) Obtain a qualifying score on a Department-approved content area test or a comparable state-approved content test; and

(4) Present official documentation from the local superintendent of schools, or a Department-recognized head of an organization of nonpublic schools, of completion of standards-based pre-employment training that includes:

(a) A minimum of 90 hours of study that may consist of a combination of semester hours and clock hours and that are based on Maryland Essential Dimensions of Teaching or the Interstate New Teacher Assessment and Support Consortium standards and include:

(i) Elementary reading processes and acquisition; or

(ii) Secondary teaching reading in the content areas part I;

(b) Enrollment in a Department-approved alternative preparation program; and

(c) An internship which was part of a Department-approved alternative preparation program.

D. Instead of meeting the requirements in §C of this regulation, an applicant may present official verification from the local superintendent of schools, or a Department-recognized head of an organization of nonpublic schools, of a valid alternative certificate issued pursuant to an out-of-State program that Maryland accepts under the Interstate Certification Compact.

E. The local superintendent of schools, or a Department-recognized head of an organization of nonpublic schools, shall file a written request with the State Superintendent of Schools for the issuance of the Resident Teacher Certificate after the applicant has met the requirements under §C of this regulation.

F. An applicant who holds the Resident Teacher Certificate shall be eligible for the Standard Professional Certificate upon receipt by the Department of all of the following items:

(1) Completion of an approved alternative program as verified by the program provider;

(2) A qualifying score on the applicable Department-approved pedagogy test; and

(3) Satisfactory teaching performance during the period of the residency as verified by the local superintendent of schools or a Department-recognized head of an organization of nonpublic schools.

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