



September 15, 2021

Maine Department of Education  
c/o Jaci Holmes, Rulemaking Coordinator  
State House Station #23  
Augusta, ME 04333

Re: Chapter Rule 115 Rulemaking

To Whom It May Concern:

The University of Maine System (UMS) is the state's largest producer of classroom-ready teachers, having awarded nearly 4,000 education degrees or certificates just in the past five years. Among our six State-approved educator preparation programs are Maine's only to have earned national accreditation: University of Maine (UMaine), University of Maine at Farmington (UMF) and University of Southern Maine (USM). We are proud that eight of the past 10 Maine Teachers of the Year have been our graduates, one of whom now leads the Education Program at the University of Maine at Presque Isle (UMPI).

It is with this tradition of excellence and experience in preparing thousands of talented teachers and administrators working today in schools across Maine that these programs offer our collective comments on the changes to Rule Chapter 115 being proposed by the State Board of Education. Please note that several university subject matter experts (e.g. literacy and language instruction) will additionally be providing detailed comment on various aspects of the proposed rule given their highly relevant teaching experience and research findings.

We understand the unprecedented and immediate workforce challenges facing Maine's PK-12 schools that are undoubtedly driving many of the suggested updates to the State's credentialing criteria. UMS and its universities are committed to continuing to work with the Maine Department of Education, the State Board, and other stakeholders to creatively combat these critical shortages. Many efforts are already underway, including scaling statewide a teacher residency program piloted in the 2020-21 academic year in Biddeford schools with USM, UMF, and UMaine; expanding accelerated high-quality online degree and certificate programs that are convenient for working professionals and paraprofessionals; and establishing intentional early college pathways that allow aspiring Maine teachers to get a head start on their preparation while still in high school. However, as the State Board and the Department seek to quickly grow the workforce, we urge you to not compromise evidence-based preparation models that are proven to produce the best outcomes for Maine students and teachers. Statute and rule changes should be backed by data and research. To this end, our colleagues who comprise the Maine Education Policy Research Institute (MEPRI) will be submitting separate comments to crosswalk key changes proposed for Chapter 115 to findings of recent MEPRI studies in Maine schools.

**Emergency Teacher Certification:** The permanent Emergency Teacher Certificate proposed in Part I Standards and Procedures for Credentialing would greatly undermine teacher quality, and ultimately harm both Maine students and the educator workforce. Adequate teacher preparation must not be considered a "barrier" to joining Maine's educator workforce, rather the baseline. Teacher preparation must be supported accordingly with public policy and investment like State

funding for residency models that allow individuals to remain employed while pursuing necessary teacher education.

As written in the proposed rule, an Emergency Teacher Certificate could allow an individual to teach students in Maine schools for up to three years having never taken a single content or pedagogy course – or even passed a criminal history records check (CHRC).

All Maine students deserve consistent access to high-quality teachers and school leaders. Underprepared teachers lead to lower levels of achievement for all students, but disproportionately harm those in high-poverty schools and/or who are historically underserved. Without provisions that ensure those certified through alternative pathways are prepared to at least a minimum standard before taking full classroom responsibility, and that their professional practice and growth is continually supported, Maine risks undoing the important work being led by the Department, State Board, schools, and our own institutions to close achievement gaps and advance social mobility through equitable access to competent educators.

Before permanently enacting this emergency certification, we strongly encourage the Department or the Maine Legislature's Education and Cultural Affairs Committee to commission our colleagues at MEPRI to evaluate the initial outcomes for workforce retention of emergency educational technician and teacher certificate holders temporarily authorized by Executive Order during the COVID-19 pandemic. This should include analysis of the demographics of the schools in which emergency licensees are working, considering factors like geography and the percentages of students who are economically disadvantaged, have IEPs, or are English learners. It would also be important to evaluate the impact of underprepared teachers on student learning to the extent possible. As the Department's own Teach Maine draft strategic plan notes.

*"The single most important factor in quality education is quality teachers....While well-intentioned, low impact strategies may not be a prudent use of resources. 35% of emergency credentialed teachers leave within the first year of teaching, and more than 60% never receive a credential at all... Therefore, investing in evidence-based models of high retention pathways into teaching addresses the high financial and human capital costs of teacher turnover. The long-term retention for graduates of higher education teacher preparation is higher than for alternative pathways to teaching, making the investment cost-effective."*

If the State Board is determined to move forward at this time with the Emergency Teacher Certificate, at a minimum UMS urges the following amendments to the proposed rule:

- To protect the safety of Maine students and school communities, satisfactory completion of a CHRC *must* be required of all applicants.
- The certificate-holder must maintain continued enrollment in an approved educator preparation program and be making satisfactory progress toward the intended degree or credential, rather than simply being enrolled in a program at the time of application for emergency licensure.
- Define what constitutes "equivalent work or academic experience" to a four-year postsecondary degree.
- Better define mentorship and supervision requirements to ensure that induction is of high-quality and continues for the entire duration of the emergency certification period.

- Require assurance from employing districts that the emergency certified teacher has satisfactorily met evaluation standards of the district's approved PEPG system in order for the Commissioner to grant a renewal.
- As a technical matter, the State Board may wish to clarify whether the Emergency Education Technician certification obtained through a fast-track online training course that results in Ed Tech III authorization would be all that is required to fulfill the "holds a certification as an Educational Technician III" pathway to an Emergency Teacher Certificate. We sincerely hope this is not the intention, as that program is designed to prepare individuals to be paraprofessionals who assist teachers as part of a larger teaching team.

It should be noted that while some of the proposed changes to Chapter 115 were informed by the consensus-based rulemaking committee on which several UMS educator preparation faculty participated, emergency certification was not included in the purview of that process. Thus, it has not yet been vetted by the Professional Standards Board of key stakeholders, though we acknowledge it is generally aligned with authority granted by P.L. 2021, Chapter 228 (LD 1189).

**Grade Spans:** UMS educator preparation programs appreciate the attraction to some school administrators and teachers of establishing wider certification bands, as proposed by this rule. However, there was unanimous agreement among UMS educator preparation program leaders and faculty that the grade spans proposed by this rule are far too expansive. They would especially do a disservice to our youngest and most vulnerable learners as they are inconsistent with child development and evidence-based practice for effective, engaging teaching and learning. Similarly, the content expectations are inadequate minimum preparation for the middle-level curriculum.

The automatic inclusion of Pre-K in any span that currently includes kindergarten is especially problematic given the developmentally appropriate practice and teacher preparation required to serve the unique needs of four-year-old learners (despite the direction of IDEA as it pertains to Special Education endorsement). Furthermore, there are no early childhood methods in the list of required courses for elementary certification, and aspiring educators preparing to teach under that certification work with the Maine Learning Results (K-12) and not the Maine Early Learning and Development Standards, which are designed to improve practice and programs for children ages 3 to kindergarten. Similarly, the Birth-5 focus of the 282 endorsement (Teacher of Children with Disabilities) does not require any courses focused on early intervention and content specific to young children (birth to age 5) and their families, and should be given the critical foundation these early services and supports provide for later success. Meanwhile, middle school education (grades 6-8) is a separate discipline with its own extensive body of research that informs developmentally responsive practice and teacher education.

We acknowledge there is no perfect solution that balances the narrower grade spans supported by research and the wider ones sought by some schools in search of greater flexibility. That said, we support previous recommendations to the State Board and the Legislature for the following certification grade spans: PreK-3, K-6, 5-8, and 6-12. To minimize impact on the current workforce, the current K-8 credential could be retained in statute for renewals only, thus allowing existing endorsement holders to maintain the certification as long as it does not lapse. We urge closer review of the vast body of research, including that undertaken here in Maine by MEPRI and in other states, like the 2018 study prepared for the Pennsylvania Department of Education by the Learning Policy Institute, in finalizing grade spans and would ask the State Board and the Department include UMS teacher preparation program faculty in further conversation before finalizing this important rule.

**Pathway II:** Content knowledge is a cornerstone of an effective educator and we fully support the State Board’s intent, consistent with P.L. 2021, Chapter 228 (LD 1189), to provide other opportunities to demonstrate content knowledge and key teaching skills beyond the core Praxis exam. We applaud this long-overdue change. That said, we make the following recommendations to strengthen the proposed new options by which teaching ability could be assessed through Pathway II:

- Instead of the basic skills test that measures reading, writing, and math (Praxis I), rely on Praxis II or another validated, reliable measure that assesses content-area knowledge appropriate to the endorsement.
- Better define in the rule the expectations of a “successful portfolio,” including the evaluation processes that will prevent unintentional bias and allow educators to authentically demonstrate their ability to teach effectively within the endorsement being sought. Since this option is intended to offer an alternative *content knowledge* assessment, it should prioritize measurement of those skills.

Additionally, UMS seeks the inclusion of language in the rule (or in the legislation that will ultimately lead to its enactment) that is explicit in stating that State-approved programs (Pathway I) are not required to automatically update their course sequences when the revised rule ultimately goes into effect to include the courses being added into Pathway II, rather that these courses *may* be considered as part of future program re-approval.

As a technicality, we believe all approved programs now incorporate an approved exceptionalty course and thus the inclusion of Item C in the list of Pathway I requirements (“Completed an approved course for teaching students with exceptionalities in the regular classroom”) is redundant and can be eliminated for clarity.

**Other changes:** There are a number of changes UMS teacher preparation programs wholeheartedly support. These include:

- The creation of a new endorsement that includes both Health and Physical Education, and limits the student teaching requirement to just one semester if it includes experiences in both settings. This common-sense combination endorsement recognizes the practical reality that many educators, especially in smaller schools and SAUs, are called upon to teach both Health and PE while not compromising professional preparation. In 2020, UMF and UMPI announced a new partnership through which UMPI faculty will provide online coursework in PE to UMF students and UMF will deliver online School Health coursework to UMPI students, allowing graduates of both programs to effectively teach – and earn dual certification. This is but one example of the innovation of UMS universities in meeting the evolving needs of Maine schools.
- The addition of American Sign Language, Hebrew, and Arabic to the World Language endorsement group, and the flexibility incorporated for more easily adding new languages in the future in response to Maine’s changing student demographics.

Finally, UMS wants to make clear that the input above reflects areas where the leaders of all of our educator preparation programs were in full agreement and felt it imperative to weigh-in with one collective, clear voice. However, one area where we did not reach consensus was on the changes in Pathway II related to the removal of some required courses in exchange for nine credits of literacy from a menu of options. From a practical perspective, flexibility is beneficial for institutions of higher education and aspiring educators. From a preparation perspective, we know the fundamental importance of foundational coursework in reading and writing methods,

as well as literacy and language development to effectively teach beginning readers. The State Board will receive more detailed consideration about this from one of our university colleagues.

In conclusion, as the draft Teach Maine strategic plan makes clear, it is not the existing certification process that is generally the barrier to entry and retention in the teacher workforce. Rather, it is a combination of long-standing challenges including inadequate compensation and the relative cost of educator preparation programs – even at public institutions like ours that are highly affordable.

In recent years, the Mills Administration and the Maine Legislature have taken historic steps to address these workforce barriers, raising the minimum teacher salary and funding 55% of PK-12 public education costs while helping to advance college affordability by expanding the need-based Maine State Grant program and providing adequate appropriation that allowed UMS to hold in-state undergraduate tuition flat this academic year – the seventh time our System has done so in the last 12 years. At a time when our students need well-prepared teachers more than ever before, we should not promulgate policy to cut corners and weaken standards and quality. Instead, we should work together to leverage these record State investments, and exciting new funding opportunities including through federal relief dollars and the restoration of Congressional earmarks, to continue improving pay and benefits for our teachers and expanding access to appropriately flexible, high-retention, comprehensive preparation pathways. Maine students deserve nothing less and our state's future demands it.

Thank you for your ongoing service to Maine's students and the schools who proudly serve them. We welcome further dialogue with the State Board, the Department, and the Legislature to improve this rule as it moves toward final adoption and continued collaboration to strengthen and grow Maine's teacher workforce.

Sincerely,



Robert Placido, Vice Chancellor for Academic Affairs, University of Maine System

*(on behalf of University of Maine College of Education & Human Development, University of Maine at Augusta Education Program, University of Maine at Farmington College of Education, Health & Rehabilitation Services, University of Maine at Machias Education & Special Education Programs, University of Maine at Presque Isle College of Professional Programs & Education, and University of Southern Maine School of Education & Human Development)*

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