



July 11, 2012

Arkansas State Board of Education
Four Capitol Mall
Little Rock, AR 72201

Dear Members of the Board:

Please accept these comments presented on behalf of Arkansas ASCD (AASCD) related to the proposed changes to the rules pertaining to the document titled: *Arkansas Department of Education Rules Governing Educator Licensure*. The impact of these changes is of particular interest to our organization since our membership includes the entire range of educators in the state from grades Pre-K – 12 and higher education.

The AASCD commends the Arkansas Department of Education (ADE) for consolidating all the rules and regulations into one document. This will streamline the efforts of everyone concerned to determine the appropriate process and definitions that may apply to the various areas of teacher licensure.

Secondly, we appreciate the opportunity educators have had to participate in the Teacher Licensure Task Force. This has allowed many perspectives to contribute to this proposed document.

The AASCD legislative committee convened a panel of AASCD members to review the proposed rules. To a great extent, the AASCD legislative committee concurs with the proposed changes. In areas where further review is suggested, we are submitting the following six (6) responses followed by concern and recommendations to address those concerns.

1. Response to: Appendix A, Areas and Levels of Licensure

a. *Concern:*

- It appears that the requirement of an Initial License for a special education teacher and a library media specialist can be obtained without any prior regular classroom experience.
- A teacher of special education students should be highly qualified with a strong knowledge of pedagogy and curriculum in the regular classroom. As observed

through the requirements of *No Child Left Behind* and now with the Common Core State Standards, the expectation is that the special education student be held to the same standard as the traditional learner. It seems unreasonable to expect a teacher with no traditional classroom experience to be able to “close the gap” of learning without some instructional background knowledge by working directly with traditional students first.

- The expectations for the teaching component of the library media specialist appear to be increasing with the transition into the Common Core. The pedagogy of the classroom should be the pedagogy of the library. Regular classroom experiences are essential as the library media specialist supports the work of the classroom as we transition into the Common Core.

- b. *Recommendation:* If the cause for the need to expedite the pathway for special education teachers and/or library media specialists is linked to a paucity of people with those credentials, perhaps incentives should be created to entice regular classroom teachers to obtain their special education license or library media specialist license after spending two or more years in the regular classroom.

2. Response to: Section 6.01.4 “...graduate-level program of study...to include two (2) internships...”

- a. *Concern:* It has been suggested by some that the number of internships be reduced to one (1). The AASCD legislative committee believes that the internship should be reflective of the K-6 and the 7-12 grade spans. This appears to be an essential element of the program of study for a well-prepared candidate.
- b. *Recommendation:* The amount of time required for the internship should provide candidates with experiences of equivalent time in each of the grade spans. Universities have NCATE and SPA requirements that set suggested number of hours for these experiences. Universities may choose to offer internship experiences throughout their program of study as well as through a capstone internship of one or two semesters.

3. Response to: Section 6.01.4 “...graduate-level program of study...to include one (1) portfolio...” and Section 2.19 “‘Portfolio’ means an accumulation of materials and documented experiences reflecting the competencies of the candidate...”

- a. *Concern:*
 - It has been suggested by some that the portfolio should not be a component of the rules defining the program of study for an administrative candidate. The AASCD legislative committee believes strongly that a properly constructed portfolio is an essential activity that deepens the candidate’s understanding of

the required standards. Therefore, we support the ADE's inclusion of this expectation within the program of study.

- Secondly, the expectation of accumulating artifacts will be an expectation within the new teacher evaluation process as well as the principal evaluation system. It appears that the experiences related to creating a portfolio with artifacts aligned to standards will prepare an administrator to lead a similar process with faculty members.

- b. *Recommendation:* The concerns that may be levied around the quality of the portfolio system should be reviewed by those designing the programs of study to ensure quality control as we institute a parallel performance-based system as a part of the K-12 educational model with the Teacher Effectiveness Support System (TESS).

4. **Response to: Section 4.0 Ancillary License Requirements** (*Note: In general the AASCD legislative committee commends the recommendation for the Ancillary License requirements. The fields listed are those that would benefit from this type of licensure.*)

Response to Section: 4.02 Ancillary Standard License in Clinical Counseling

- a. *Concern:* The AASCD legislative committee believes that there is merit in having school counselors with classroom experience based on the expectation that their work is to ensure that the overall educational experience is supported through the work of the counselor.
- b. *Recommendation:* Schools should be able to meet the overall ratio that exceeds 1:450 of counselors to students using Clinical Counselor model, but consideration should be given to having the initial standard be met with a traditionally licensed school counselor. This model could be similar to the meeting of the physical education student-teacher ratio with both a certified and a non-certified staff member.

5. **Response to: Section 4.02.1 and Section 4.04 references to Administrator Licensing**

- a. *Concerns:*
 - Concern 1 – AASCD legislative committee believes that is essential for individuals who desire to be administrators to have classroom teaching experience. It appears that within the Ancillary License process this is not an absolute requirement. Likewise, Section 4.04 Ancillary Standard License in Speech Language Pathology states that this licensure pathway allows for adding the Curriculum/Program Administrator License. This, too, appears to open the door for other administrative licenses without classroom teaching experiences according to Section 6.02 of the Rules.

- Concern 2 – There is some concern that the manner in which this rule is stated that Section 4.04 places districts in the position of paying a Speech Language Pathologist from the Administrator salary schedule. This may put an increased financial burden on a school district.

b. *Recommendations:*

- i. Recommendation 1 – The sections of the proposed rules that pertain to exemptions for eligibility for administrator licensing should be reviewed. The references in Section 4.02.1 that provide exceptions (“except by meeting the criteria of Section 4.03”) should be stricken if there is no provision for classroom teaching experience. All licenses provided via the Ancillary Licenses process should not have a pathway to an administrative license without classroom teaching experience. It is recommended that review should be made of all sections of the Rules that pertain to the awarding of an Administrative License to ensure that administrators have classroom experiences prior to being an administrator.
- ii. Recommendation 2 – No increased financial burden should be placed on the districts.

6. Response to: Section 6.01.6.3 Administrator License Requirements for those who work at ADE or at an educational service cooperative

- a. *Concern:* The AASCD legislative committee believes that those with experiences at either an educational service cooperative or the Arkansas Department of education should also have two years of teaching experience prior to being considered for a building level administrator license.
- b. *Recommendation:* Review the criteria within the rules to ensure that all candidates for administrative licenses have at least two years of teaching experience.

Thank you for reviewing our submission regarding the Arkansas Department of Education Rules Governing Educator Licensure. Should you need further clarification regarding any of these comments please feel free to contact me.

Respectfully submitted on behalf of the Arkansas ASCD Legislative Committee,

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Chair, Arkansas ASCD Legislative Committee