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TO: Members of the State Board of Education
FROM: Bernard J. Sadusky, Ed.D. *BJS/cln*
DATE: September 27, 2011
SUBJECT: COMAR 13A.12.02.27, Specialized Professional Areas (Grades 7-12)
(NEW)

PURPOSE:

The purpose of this item is to present proposed regulation, COMAR13A.12.02.27, Specialized Professional Areas (Grades 7-12) which incorporates recommendations received during the open comment period when this regulation was originally published in the *Maryland Register*. This also provides you an opportunity to convene a Joint Conference Committee should you so desire.

BACKGROUND INFORMATION:

At your April 26-27 meeting, you reviewed the proposal which the Professional Standards and Teacher Education Board (PSTEB) had voted to publish at its April meeting, and you determined that a Joint Conference Committee was not necessary prior to publication. The proposed regulation was published in the *Maryland Register* on July 1, 2011; the period for public comment ended August 1, 2011 and several comments with recommendations were submitted.

Staff presented an analysis of those comments (attached) to the PSTEB at its August 4, 2011 meeting. After discussion, the PSTEB voted to accept two of the recommendations and republish the proposed regulation incorporating the proposed changes which included specifying the number of credits required in the professional education sequence and limiting the scope of the certificate to specialized programs and/or specialized schools.

SUMMARY:

The proposed regulation being presented for your reconsideration incorporates two of the recommendations received during the open comment period when this was first published in the *Maryland Register*. This regulation provides another pathway for individuals with specific professional expertise to enter the teaching profession.

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ACTION:

This item is presented for information and to provide an opportunity for you to request a Joint Conference Committee with the PSTEB prior to publication if you so desire.

BJS: jes

Attachments

**Analysis of Written Testimony Concerning
Proposed Regulation, COMAR 13A.12.02.27,
Specialized Professional Areas (Grades 7-12)**

Writer: Florence G. Bozzella, Director of Human Resources, Anne Arundel County Public Schools

Comments: We believe there is merit to the proposal but have several concerns. The intent of this regulation is to recognize experience and mastery of a field as the gateway into teaching in a specialized subject area in a specialized program in a Maryland public school system. Therefore, this should be limited to a specific assignment in a specific school. The regulations do not address the manner in which the individual will maintain that high level of expertise while teaching; these teachers should be required to stay current and to demonstrate continual growth in their professional careers.

These teachers will not have the same depth of pedagogy as other individuals who have completed approved programs or alternative preparation programs. We question whether it is appropriate that they hold the same type of certificate and be eligible to earn other subject area endorsements and move out of the specialized field. We recommend that the certificate be limited to two years and be renewable a limited number of times. We also recommend establishing the number of semester hours required for the professional education course work.

The proposal does not address the route by which the Advanced Professional Certificate will be earned for those individuals who hold a high school diploma or equivalent.

In addition, local school systems must comply with *No Child Left Behind*; teachers of core academic subjects must be highly qualified. A bachelor's degree is the minimum degree requirement and "highly qualified" can be earned by complete thirty semester hours of course work or presenting a qualifying score on the appropriate content assessment. Individuals who lack the requisite bachelor's degree will never be able to obtain highly qualified status which will further complicate the issue for local school systems.

Writer: Paula Lawton, Executive Director, Human Resources, Frederick County Public Schools

Comments: That this proposal allows a person who is a skilled professional in a particular subject area to share their expertise with students is admirable. We believe, however, that the circumstances under which the certificate is issued be limited to a specific assignment, at a specific school, and for specific time period.

We have concerns regarding the following:

Validity period: This certificate should be issued for a specific assignment during a specified time frame.

Pedagogy preparation: It is not clear in the regulation how these skills may be acquired and the regulation is silent on the number of credits required.

Parity with Program Completers: Since the preparation would be limited compared to that of other teacher candidates, it does seem that they should hold an equal certificate to those candidates. If this were a limited certificate in time and scope, the difference would be apparent. These candidates should not be allowed to expand their certificate to teach in any other area without equal preparation of teachers holding professional certificates. A unique/credential/license, not a teaching certificate would be a more appropriate title for this aturtorication to teach.

Renewal requirements: Continued professional development requirements are not addressed. This regulation does not outline expectations for certificate renewal or course/credit requirements to qualify for an Advanced Professional Certificate.

Impact on Highly Qualified Staff Reporting: It is anticipated that candidates who will seek this certification will be teaching core academic subjects, such as art, music, dance, etc. Since most candidates for this certificate would be conditional, at least for two years, they would not be highly qualified. As this regulation is written, it would seem to deter local school systems from the goal of having all classes taught by a highly qualified teacher.

Writer: Donna Newcomer, Director of Human Resources and Teacher Personnel,
Washington County Public Schools

Comments: The Professional Standards and Teacher Education Board should specify the number of credits required for the professional education sequence. For consistency, Continuing Professional Development (CPD) courses should be limited to nine credits as in the Trades and Industry regulations. Also, the courses should mirror the Trades and Industry course work requirements with the same number of credits being required.

It should also be specified that the specialized professional area appear in the endorsement area on the certificate in order to show that the certification is not transferable to a corresponding discipline in a comprehensive school.

Writer: Marie Bercaw, Certification Coordinator, Office of Human Resources &
Development Dept of Certification & Continuing Ed/Certification Unit,
Montgomery County Public Schools

Comments: We believe there is merit to the proposal but also believe that there are several items that need clarification and clear guidelines as follows:

1. The intent of the regulation is to recognize experience and mastery of a field as the gateway into teaching a specialized subject area in a specialized

program. However, the regulation does not state recency of the “five years of satisfactory professional experience in the area to be taught.”

2. Since this route to certification is intended for specialized areas and is not transferable to corresponding disciplines in a comprehensive school,” then can it further be limited to a specific assignment in a specific school?

3. The regulations do not address the manner in which the individuals will maintain that high level of expertise while teaching. How will these teachers be required to stay current and to demonstrate continued growth in their professional careers?

4. These teachers will not have the same depth of preparation in pedagogy as individuals completing teacher preparation programs. Is it appropriate that they hold the same type of certificate as other educators?

5. The proposed regulation does not specify the number of semester hours needed in the professional education sequence.

6. Maryland schools are under pressure to achieve 100% compliance under *No Child Left Behind*. Teachers of core academic subject areas must be highly qualified. A bachelor’s degree is the foundational requirement and highly qualified can be achieved by completing thirty (30) semester hours of credit or by presenting qualifying scores on the appropriate content assessment. The Educational Testing Service (ETS) requires content area test takers to hold a minimum of a bachelor’s degree. If these individuals do not hold a bachelor’s degree or are not eligible to take the test, then will another route to achieve highly qualified status be designed or determined?

.27 Specialized Professional Areas (Grades 7-12).

A. To receive certification in specialized professional areas (grades 7-12), the applicant shall complete one of the following options:

1. Option I:

(a) An applicant shall have earned a bachelor's or higher degree from an IHE in the area to be taught and provide official verification of 5 years of satisfactory career professional experience in the area to be taught; and

(b) Meet the professional education course work required in §B of this regulation;

2. Option II:

(a) An applicant shall have earned an associate's degree in the area to be taught and provide official verification of 5 years of satisfactory career professional experience in the area to be taught; and

(b) Meet the professional education course work required in §B of this regulation; or

3. Option III:

(a) An applicant shall have earned a secondary school diploma and provide official verification of 5 years of satisfactory career professional experience in the area to be taught; and

(b) Meet the professional education coursework as required in §B of this regulation.

B. Professional Education Courses.

(1) The applicant for specialized professional areas shall complete 12 semester hours of professional education course work, as provided in §B(2) of this regulation, from an IHE or through Department-approved Continuing Professional Development credits.

(2) The professional education course work shall include the following topics:

(a) lesson planning and delivery of instruction;

(b) assessing instruction;

(c) diversifying instruction to accommodate special needs;

(d) managing the instructional environment; and

(e) providing literacy instruction relevant to the specialized professional area.

C. Special Provisions

1. Department-recognized specialized certifications from Department-approved professional organizations may be used in lieu of 2 years of career professional experience.

2. This certification may only be used for instruction in a specialized program or at a specialized school.

3. A list of specialized professional areas and approved professional organizations will be maintained by the Department.