



Final Regulation Agency Background Document

Agency name	Virginia Board of Education
Virginia Administrative Code (VAC) citation	8 VAC 20 –22-10 et. seq.
Regulation title	Regulations Governing the Licensure of School Personnel
Action title	Repeal old regulations and replace with new regulations
Date this document prepared	April 10, 2007

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Orders 21 (2002) and 58 (1999), and the *Virginia Register Form, Style, and Procedure Manual*.

Brief summary

Please provide a brief summary (no more than 2 short paragraphs) of the proposed new regulation, proposed amendments to the existing regulation, or the regulation proposed to be repealed. Alert the reader to all substantive matters or changes. If applicable, generally describe the existing regulation. Also, please include a brief description of changes to the regulation from publication of the proposed regulation to the final regulation.

The present action proposes substantive changes in the requirements for licensure of school personnel. In a concurrent action, the Board of Education proposes to repeal the text of the current regulations (8 VAC 20-21) and promulgate new regulations (8 VAC 20-22). Substantive new requirements are proposed for the following areas:

- 1) conditions for licensure; 2) types of licenses; 3) designations of career paths to teaching; 4) added endorsements by examination; 5) conditions for licensure by reciprocity; 6) names of endorsements and requirements for some teaching areas; 7) the addition of an add-on endorsement in early childhood for three- and four-year olds and a mathematics specialist endorsement; 8) the administration and supervision endorsement; 9) professional studies requirements; and 10) Revocation, Cancellation, Suspension, Denial, and Reinstatement of Teaching Licenses.

Statement of final agency action

Please provide a statement of the final action taken by the agency including (1) the date the action was taken, (2) the name of the agency taking the action, and (3) the title of the regulation.

On March 29, 2007, the Virginia Board of Education approved the proposed *Licensure Regulations for School Personnel* (8 VAC 20 –22-10 et. seq).

Legal basis

Please identify the state and/or federal legal authority to promulgate this proposed regulation, including (1) the most relevant law and/or regulation, including Code of Virginia citation and General Assembly chapter numbers, if applicable, and (2) promulgating entity, i.e., agency, board, or person. Describe the legal authority and the extent to which the authority is mandatory or discretionary.

- **Article VIII, Section 4 of the Constitution of Virginia (1971):** Provides the Board of Education with the authority and responsibility for the “general supervision of the public school system.”
- **Code of Virginia, Section 22.1-298. Regulations Governing Licensure:** The Board of Education shall, by regulation, prescribe the requirements for the licensure of teachers.
- **Code of Virginia, Section 22.1-299. Licensure Required of Teachers:** No teacher shall be regularly employed by a school board or paid from public funds unless such teacher holds a license issued by the Board of Education.
- **Code of Virginia, Section 22.1-305.2. Advisory Board on Teacher Education and Licensure:** The Advisory Board on Teacher Education and Licensure shall advise the Board of Education and submit recommendations on policies applicable to [Teacher Education and Licensure].

Purpose

Please explain the need for the new or amended regulation. Describe the rationale or justification of the proposed regulatory action. Detail the specific reasons it is essential to protect the health, safety or welfare of citizens. Discuss the goals of the proposal and the problems the proposal is intended to solve.

Section 21-298 of the *Code of Virginia* requires that the Board of Education prescribe the requirements for licensure of teachers by regulation. The last comprehensive review of the *Regulations Governing the Licensure of School Personnel* was conducted in the mid-1990s with regulations becoming effective July 1, 1998. The regulations

need to be revised based on federal and state legislation as well as to address recommendations to clarify and change requirements for licensure.

Substance

Please identify and explain the new substantive provisions, the substantive changes to existing sections, or both where appropriate. A more detailed discussion is required under the "All changes made in this regulatory action" section.

The present action proposes substantive changes in the requirements for licensure of school personnel. In a concurrent action, the Board of Education proposes to repeal the text of the current regulations (8 VAC 20-21) and promulgate new regulations (8 VAC 20-22). Substantive new requirements are proposed for the following areas: 1) conditions for licensure; 2) types of licenses; 3) designations of career paths to teaching; 4) added endorsements by examination; 5) conditions for licensure by reciprocity; 6) names of a few endorsements and requirements for some teaching areas; 7) endorsement areas by adding the mathematics specialist, school manager, and speech language assistants; and 8) the administration and supervision endorsement.

Issues

Please identify the issues associated with the proposed regulatory action, including:

- 1) the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions;*
- 2) the primary advantages and disadvantages to the agency or the Commonwealth; and*
- 3) other pertinent matters of interest to the regulated community, government officials, and the public.*

If there are no disadvantages to the public or the Commonwealth, please indicate.

The *Code of Virginia* requires that the Board of Education prescribe the requirements for licensure of teachers by regulation. Amendments to the Licensure Regulations for School Personnel were needed to respond to enactments of federal and state laws. The primary advantage is that the regulations will be aligned with federal and state laws and regulations pertaining to teacher qualifications and licensure, as well as incorporate recommendations to improve the preparation of instructional personnel in Virginia.

Changes made since the proposed stage

Please describe all changes made to the text of the proposed regulation since the publication of the proposed stage. For the Registrar's office, please put an asterisk next to any substantive changes.

Section number	Requirement at proposed stage	What has changed	Rationale for change
10		<p>"Cancellation" means the [withdrawal annulment, voiding, or invalidation] of a teaching license following [the voluntary return surrender] of the license by the license holder.</p> <p>"Local Eligibility License" means a license [issued pursuant to Virginia Code Section 22.1-299.3 established by the Virginia General Assembly issued] to an individual by a local school board based on specified criteria set forth by [the that section. Code of Virginia.]</p> <p>"Mentor" means a classroom teacher hired by the local school division who has achieved continuing contract status or other instructional personnel including retired teachers who meet[s] local mentor selection criteria</p> <p>"Postgraduate Professional License" means a five-year, renewable license available to an individual who has qualified for the Collegiate Professional License and who holds an appropriate earned graduate degree from a[n regionally] accredited institution.</p> <p>"Provisional License" means a nonrenewable license valid for a period not to exceed three years issued to an individual who has allowable deficiencies for full licensure as set forth in these regulations. The individual must have a minimum of an undergraduate degree from a[n regionally accredited] college or university (with the exception of those individuals seeking the Technical Professional License). The Provisional License, with the exception of those individuals seeking licensure through a career switcher program [who will be issued a one-year Provisional License], will be issued for three years[, if all testing requirements prescribed by the Board of Education have been completed. If the individual has not met testing requirements prescribed by the Board of Education, the license will be issued for [one year (July 1 to June 30) from the contractual date of employment.] during which time the individual must complete all testing requirements. The license may be extended for one year upon the completion of all testing requirements. Individuals must complete all requirements for a renewable license within the validity period of the license. [Upon meeting the testing requirements in the first year of the license, the license may be extended for two years. Individuals must complete the requirements for the regular, five-year license within the validity period of the license.]</p> <p><u>"Pupil Personnel Services License" means a five-year, renewable license available to an individual who has earned an appropriate graduate degree from a[n regionally] accredited institution with an endorsement for guidance counselor, school psychologist, school social worker, special education[,-] speech-language disorder preK-12, or vocational evaluator. This license does not require teaching experience.</u></p> <p><u>"Renewable license" means a license issued by the Board of Education for five years to an individual who meets the requirements specified in the Board of Education regulations.</u></p> <p><u>"Revocation" means the [withdrawal annulment by</u></p>	<p>Changes needed to conform to other revisions in document</p>

		recalling, repealing, or rescinding of a teaching license.	
40	To reduce the period of time from three years to one year to take licensure assessments	B. All candidates who hold at least a baccalaureate degree [from a regionally accredited college or university] and who seek an initial Virginia teaching license must obtain passing scores on professional teacher's assessments prescribed by the Board of Education. With the exception of the career switcher program that requires assessments as prerequisites, individuals must complete the professional teacher's assessments within [the three-year validity of the initial provisional license, one year of the contractual date of employment.] Candidates seeking a Technical Professional License, the International License, School Manager License or the Pupil Personnel Services License are not required to take the professional teacher's assessments.	To continue to allow three years to meet testing requirements (in response to public comment)
50	To reduce the period of time from three years to one year to take licensure assessments To date licenses, when individuals need to meet testing requirements, one year from the contractual date of employment	<p>1. Provisional License. The Provisional License is a nonrenewable license valid for a period not to exceed three years issued to an individual who has allowable deficiencies for full licensure as set forth in these regulations. The individual must have a minimum of an undergraduate degree from a [a regionally] accredited college or university (with the exception of those individuals seeking the Technical Professional License). The Provisional License, with the exception of those individuals seeking licensure through a career switcher program, will be issued for three years. if all testing requirements prescribed by the Board of Education have been completed. [If the individual has not met testing requirements prescribed by the Board of Education, the license will be issued for one from the contractual date of employment]. Upon meeting the testing requirements in the first year of the license, the license may be extended for [two one years]. Individuals must complete the requirements for the regular, five-year license within the validity period of the provisional license.</p> <p>3. Postgraduate Professional License. The Postgraduate Professional License is a five-year, renewable license available to an individual who has qualified for the Collegiate Professional License and who holds an appropriate earned graduate degree from a [a regionally] accredited college or university.</p> <p>4. Technical Professional License. The Technical Professional License is a five-year, renewable license available to a person who has graduated from an accredited high school (or possesses a General Education Development Certificate); has exhibited academic proficiency, skills in literacy and communication, technical competency, and occupational experience; and has completed nine semester hours of specialized professional studies credit from a [a regionally accredited college] or university.</p> <p>5. School Manager License. The school manager license is [a five-year, renewable license] intended to provide for the differentiation of administrative responsibilities in a school setting. A school manager is licensed to administer noninstructional responsibilities in an educational setting. For example, a school manager is restricted from evaluating teachers, supervising instruction, developing and evaluating curriculum, and serving as a school's</p>	To grant three years to meet testing requirements (in response to public comment) The change was needed so that teachers' licenses would not expire during the school year. Dismissing teachers mid-year is not practical for divisions or instructionally appropriate for students. This change was in response to public comment.

		<p><u>student disciplinarian. The license is available to a candidate who holds a baccalaureate degree from a regionally accredited college or university; has three years [of] successful managerial experience; and is recommended for the license by a Virginia school division superintendent.</u></p> <p><u>6. Pupil Personnel Services License. The Pupil Personnel Services License is a five-year, renewable license available to an individual who has earned an appropriate graduate degree from a [a regionally accredited college] or university with an endorsement for guidance counselor, school psychologist, school social worker, special education, --speech-language disorders preK-12, or vocational evaluator.</u></p> <p><u>7. Division Superintendent License. The Division Superintendent License is a five-year, renewable license available to an individual who has completed an earned master's degree from a [a regionally accredited college] or university and meets the requirements specified in 8 VAC 20-22-600.</u></p> <p><u>8. International Educator License. The International Educator License provides a three-year cultural exchange opportunity for Virginia students and international teachers. The International Educator License is a professional, teaching license issued for no more than three years to an exchange educator with citizenship in a nation other than the United States of America, and employed as an educator in a Virginia public or accredited nonpublic school, to teach for up to three consecutive years. [This license does not require professional teacher's assessments; however, the individual will be subject to assessment requirements if seeks a five-year renewable license.]</u></p> <p><u>All licenses will be effective from July 1 in the school year in which the application is made [except for the Provisional License when an individual needs to meet assessment requirements prescribed by the Board of Education. The Provisional License, with the exception of individuals in a career switcher program, will be dated one year from the contractual date of employment in a Virginia public or accredited nonpublic school if the individual has not met testing requirements prescribed by the Board of Education.] A Virginia employing education division or agency is required to notify employees in writing at the time of employment of the need to meet appropriate assessment requirements for licensure [within a year from the contractual date of employment.]</u></p>	
60		<p><u>B. Teaching licenses may be issued with one of the following designations [and the designation will be processed as an add-on endorsement.] These designations will not apply to the Division Superintendent License, [School Manager License, International License], or the Pupil Personnel Services License.</u></p> <p><u>a. National board certification or a nationally recognized certification program approved by the Board of Education and [a recommendation from an employing Virginia school division superintendent or designee</u></p>	Clarification

		<p><u>or accredited nonpublic school head and documentation in an approved Department of Education format verifying the individual’s demonstrated skills and abilities as a school leader and direct contributions to school effectiveness and student achievement;</u>] demonstrated skills and abilities as a school leader as verified by a Virginia school division superintendent or designee or accredited nonpublic school head;] or</p>	
70		<p>A. An individual who holds a teaching license may add an additional endorsement to the license by passing a rigorous academic subject test prescribed by the Board of Education. This testing option does not apply to individuals who are seeking an early/primary preK-3 or elementary education preK-6 endorsement or who hold a technical professional license, vocational evaluator license, pupil personnel services license, [school manager license], or division superintendent license.</p>	Clarification
90		<p>B. An alternate route is available to individuals employed by an educational agency who seek teaching endorsements preK through grade 12. [If the individual has not met testing requirements prescribed by the Board of Education, the Provisional License will be issued for one year from the contractual date of employment. Upon meeting the testing requirements [in the first year of the license, the license may be extended for two years.] Individuals must complete the requirements for the regular, five-year license within the validity period of the [provisional] license.</p> <p>C. Alternate route in special education. The Provisional License is a [three-year] nonrenewable teaching license issued to an individual employed as a special education teacher in a public school or a nonpublic special education school in Virginia who does not hold the appropriate special education endorsement. This alternate route to special education is not applicable to individuals employed as speech pathologists. [The Provisional License will be initially issued for three years if all testing requirements prescribed by the Board of Education have been completed. If the individual has not met testing requirements prescribed by the Board of Education, the license will be issued for one year from the contractual date of employment]; upon meeting the testing requirements [in the first year of the license, the license may be extended for two years. Individuals must complete the requirements for the regular, five year license within the validity period of the license.] [To be issued the Provisional License through this alternate route, an individual must:</p> <p>2. Hold a baccalaureate degree from [a] regionally accredited college or university;</p>	To continue to allow three years to meet testing requirements (in response to public comment)
100		<p>C. Licensure by reciprocity is provided for individuals who have obtained a valid out-of-state license (full credential without deficiencies) that is in force at the time the application for a Virginia license is received by the Department of Education. The individual must establish a file in the Department of Education by submitting a complete application packet, which shall include official student transcripts. [Unless exempted by the criteria in 8 VAC 20-22-100.D., licensure assessments prescribed by the Board of Education shall be required. An assessment of basic skills as provided in § 22.1-298.1 of the Code of Virginia</p>	Clarification

		<p><u>and service requirements shall not be imposed for these licensed individuals; however, other licensure assessments as prescribed by the Board of Education shall be required.]</u></p>	
110		<p>A. <u>The Division Superintendent, Postgraduate Professional, Collegiate Professional, Technical Professional, [and] Pupil Personnel Services Licenses, and School Manager Licenses</u> may be renewed upon the completion of 180 professional development points within a five-year validity period based on an individualized professional development plan that includes ongoing, sustained, and high-quality professional development.</p> <p>E. <u>Content area courses are courses at the undergraduate level (two-year or four-year institution) or at the graduate level that will not duplicate previous courses taken in the humanities, history and social sciences, the sciences, mathematics, health and physical education, and the fine arts. These courses are usually available through the college or department of arts and sciences. License holders with elementary education, middle education, special education, or reading endorsements must satisfy the 90-point requirement through reading coursework or content coursework in one of the areas listed above. Courses available through the a regionally accredited college's or institution's department of education may be used to satisfy the content requirement for those license holders with endorsements in health and physical education, career and technical education, and library science education.</u></p>	Clarification
120		<p><u>1. Human growth and development (birth through adolescence): 3 semester hours. Skills in this area shall contribute to an understanding of the physical, social, emotional, [speech and language,] and intellectual development of children and the ability to use this understanding in guiding learning experiences [and relating meaningfully to students]. The interaction of children with individual differences – economic, social, racial, ethnic, religious, physical, and mental – should be incorporated to include skills contributing to an understanding of developmental disabilities and developmental issues related to but not limited to attention deficit disorders, gifted education including the use of multiple criteria to identify gifted students, substance abuse, child abuse, and family disruptions.</u></p> <p><u>2. Curriculum and instructional procedures: 3 semester hours.</u></p> <p><u>a. Early/primary education preK-3 or elementary education preK-6 curriculum and instructional procedures: 3 semester hours. Skills in this area shall contribute to an understanding of the principles of learning; the application of skills in discipline-specific methodology; communication processes; selection and use of materials, including media and computers; [selection, development and use of appropriate curricula, methodologies, and materials that support and enhance student learning and reflect the research on unique, age-appropriate, and culturally</u></p>	<p>To continue the requirement of Foundations of Education and incorporate competencies in instructional design based on assessment data into Curriculum and Instructional Procedures and Foundations of Education (based on public comment)</p> <p>To strengthen the competencies relative to the preparation in early childhood education (based on public comment)</p>

		<p><u>relevant curriculum and pedagogy; and] evaluation of pupil performance[; and the relationships among assessment, instruction, and monitoring student progress to include student performance measures in grading practices, the ability to construct and interpret valid assessments using a variety of formats in order to measure student attainment of essential skills in a standards-based environment, and the ability to analyze assessment data to make decisions about how to improve instruction and student performance.]</u> The teaching methods, including for <u>[limited English proficient students,] gifted and talented students</u> and those students with disabling conditions, must be appropriate for the level of endorsement (preK-3 or preK-6) and be tailored to promote student academic progress and effective preparation for the Standards of Learning assessments. <u>Study in methods of improving communication between schools and families, ways of increasing family involvement in student learning at home and in school, [and] the Standards of Learning[; and Foundation Blocks for Early Learning]</u> shall be included. <u>[Early childhood educators must understand the role of families in child development and in relation to teaching educational skills. They must demonstrate knowledge and skills in communicating with families regarding the social and instructional needs of children. Early childhood educators must understand the role of the informal and play-mediated settings for promoting students' skills and development and must demonstrate knowledge and skill in interacting in such situations to promote specific learning outcomes as reflected in Virginia's Foundation Blocks for Early Learning.]</u> Demonstrated proficiency in the use of educational technology for instruction shall be included. Persons seeking initial licensure as teachers and persons seeking licensure renewal as teachers for the first time shall complete study in child abuse recognition and <u>intervention in accordance with curriculum guidelines developed by the Board of Education in consultation with the Department of Social Services that are relevant to the specific teacher licensure routes. Pre-student teaching experiences (field experiences) should be evident within these skills.</u></p> <p>b. Middle education 6-8 curriculum and instructional procedures: 3 semester hours. Skills in this area shall contribute to an understanding of the principles of learning; the application of skills in discipline-specific methodology; communication processes, selection and use of materials, including media and computers; <u>[and] evaluation of pupil performance[; and the relationships among assessment, instruction, and monitoring student progress to include student performance measures in grading practices, the ability to construct and interpret valid assessments using a variety of formats in order to measure student attainment of essential skills in a standards-based environment, and the ability to analyze assessment data to make decisions about how to improve instruction and student performance.]</u> The teaching</p>	
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		<p>methods, including for <u>limited English proficient students,</u> gifted and talented students[, and students with disabling conditions, must be appropriate for the middle education endorsement and be tailored to promote student academic progress and effective preparation for the Standards of Learning assessments. Study in methods of improving communication between schools and families, ways of increasing family involvement in student learning at home and in school, and the Standards of Learning shall be included. Demonstrated proficiency in the use of educational technology for instruction shall be included. Persons seeking initial licensure as teachers and persons seeking licensure renewal as teachers for the first time shall complete study in child abuse recognition and intervention in accordance with curriculum guidelines developed by the Board of Education in consultation with the Department of Social Services that are relevant to the specific teacher licensure routes. Pre-student teaching experiences (field experiences) should be evident within these skills.</p> <p>3. Instructional design based on assessment data: 3 semester hours. Skills in this area shall contribute to an understanding of the relationship among assessment, instruction, and monitoring student progress to include student performance measures in grading practices, the ability to construct and interpret valid assessments using a variety of formats in order to measure student attainment of essential skills in a standards based environment, and the ability to analyze assessment data to make decisions about how to improve instruction and student performance.]</p> <p><u>4[3]. Classroom [and behavior] management: 3 semester hours. Skills in this area shall contribute to an understanding and application of classroom [and behavior] management techniques, [classroom community building,] and individual interventions, including techniques that promote emotional well-being and teach and maintain behavioral conduct and skills consistent with norms, standards, and rules of the educational environment. This area shall address diverse approaches based upon behavioral, cognitive, affective, social and ecological theory and practice. [Approaches should support professionally appropriate practices that promote positive redirection of behavior, development of social skills, and of self discipline. The link between classroom management and students' ages must be understood and demonstrated in techniques used in the classroom.]</u></p> <p><u>[4. Foundations of education: 3 semester hours. Skills in this area shall be designed to develop an understanding of the historical, philosophical, and sociological foundations underlying the role, development and organization of public education in the United States. Attention must be given to the legal status of teachers and students, including federal and state laws and regulations, school as an organization/culture, and contemporary issues in education. The historical, philosophical, and sociological foundations of the instructional design based on assessment data (the relationships among</u></p>	
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		<p><u>assessment, instruction, and monitoring student progress to include student performance measures in grading practices, the ability to construct and interpret valid assessments using a variety of formats in order to measure student attainment of essential skills in a standards-based environment, and the ability to analyze assessment data to make decisions about how to improve instruction and student performance) must be addressed.]</u></p> <p>5. Reading: 6 semester hours.</p> <p>a. Early/primary preK-3 and elementary education preK-6 – language acquisition and reading: 6 semester hours. Skills listed for these endorsement areas represent the <u>minimum competencies that a beginning teacher must be able to demonstrate. These skills are not intended to limit the scope of a beginning teacher’s program. Additional knowledge and skills that add to a beginning teacher’s competencies to deliver instruction and improve student achievement should be included as part of a quality learning experience. Skills in this area shall be designed to impart a thorough understanding of the complex nature of language acquisition and reading, to include phonemic awareness, concept of print, phonics, fluency, vocabulary development, and comprehension strategies. Additional skills shall include proficiency, in writing strategies, as well as the ability to foster appreciation of a variety of literature and independent reading.</u></p> <p><u>[Knowledge of typical language development, components and sequence of literacy development, and the connection between language development and literacy must be evident in coursework. Knowledge and skills in specific methods by which adults elicit and foster the components of language development must be included.]</u></p> <p>b. Middle education – language acquisition: 3 semester hours and reading in the content areas: 3 semester hours. Skills in this area shall be designed to impart an understanding of comprehension skills in all content areas, including a repertoire of questioning strategies, summarizing and retelling skills, and strategies in literal, interpretive, critical, and evaluative comprehension, as well as the ability to foster appreciation of a variety of literature and independent reading.</p> <p>6. Supervised classroom experience. The student teaching experience should provide for the prospective teacher to be <u>in classrooms full time for a minimum of [500 300]clock hours (including pre- and post-clinical experiences) with at least [300 150] clock hours spent supervised in direct teaching activities (providing direct instruction) at the level of endorsement. One year of successful full-time teaching experience in the endorsement area in a public or accredited nonpublic school may be accepted in lieu of the supervised teaching experience. A fully licensed, experienced teacher must be available in the school building to assist a beginning teacher employed through the alternate route.</u></p>	
140		<p><u>[8 VAC 20-22-140. Early Childhood for Three- and Four-Year-Olds (Add-on endorsement)</u></p>	<p>To add an endorsement in Early Childhood for Three-</p>

		<p><u>Endorsement requirements. The candidate must have:</u></p> <ol style="list-style-type: none"> <u>1. A Virginia teaching license with an endorsement in elementary education (such as prek-3 or prek-6):</u> <u>2. Completed 9 semester hours of graduate-level coursework in early childhood education; and</u> <u>3. Completed a supervised practicum of at least 45 instructional hours in a preschool setting (three- and four-year olds) in a public school, an accredited nonpublic school, or another program approved by the Virginia Board of Education. One year of successful, full-time teaching experience in a public or accredited nonpublic school may be accepted in lieu of the practicum.</u> <u>4. The add-on endorsement to an elementary endorsement (that includes prek) is not required to teach prek (three- and four-year olds), but the endorsement recognizes the candidate's additional preparation in early childhood.]</u> 	<p>and Four-Year-Olds (Add-on endorsement) based on public comment</p>
150-540		<p>Minor editing revisions</p>	<p>Change numbering system due to the addition of the Early Childhood for Three- and Four-Year-Olds (Add-on endorsement)</p> <p>Minor revisions for clarification</p>
150		<p><u>2. The candidate for the early/primary education preK-3 endorsement must have a degree from a an regionally accredited college]</u></p>	<p>Clarification</p>
170		<p><u>2. An applicant seeking the middle education 6-8 endorsement must have earned a degree from a an regionally accredited college]</u></p>	<p>Clarification</p>
180		<p><u>Individuals seeking licensure with preK-12 endorsements, special education, secondary grades 6-12 endorsements, or adult education may meet requirements through the completion of an approved program or, if employed by a Virginia public or nonpublic school, through the alternate route to licensure. Components of the licensure program include a degree from a an regionally accredited</u></p>	<p>Clarification</p>
190		<p><u>1. Human growth and development (birth through adolescence): 3 semester hours. Skills in this area shall contribute to an understanding of the physical, social, emotional, [speech and language,] and intellectual development of children and the ability to use this understanding in guiding learning experiences. The interaction of children with individual differences – economic, social, racial, ethnic, religious, physical, and mental – should be incorporated to include skills contributing to an understanding of developmental disabilities and developmental issues related to but not limited to attention deficit disorders, gifted education including the use of multiple criteria to identify gifted students, substance abuse, child abuse, and family disruptions.</u></p> <p><u>2. Curriculum and instructional procedures: 3 semester hours. Skills in this area shall contribute to an understanding of the principles of learning; the application</u></p>	<p>To continue the requirement of Foundations of Education and incorporate competencies in instructional design based on assessment data into Curriculum and Instructional Procedures and Foundations of Education (based on public comment)</p>

		<p>of skills in discipline-specific methodology; communication processes; selection and use of materials, including media and computers; and evaluation of pupil performance[; and the relationships among assessment, instruction, and monitoring student progress to include student performance measures in grading practices, the ability to construct and interpret valid assessments using a variety of formats in order to measure student attainment of essential skills in a standards-based environment, and the ability to analyze assessment data to make decisions about how to improve instruction and student performance.] Teaching methods appropriate for [limited English proficient students; exceptional students, including gifted and talented and those with disabling conditions]; and appropriate for the level of endorsement sought shall be included. Teaching methods shall be tailored to promote student academic progress and effective preparation for the Standards of Learning assessments. Methods of improving communication between schools and families and ways of increasing family involvement in student learning at home and in school and the Standards of Learning shall be included. Demonstrated proficiency in the use of educational technology for instruction shall be included. Persons seeking initial licensure as teachers and persons seeking licensure renewal as teachers for the first time shall complete study in child abuse recognition and intervention in accordance with curriculum guidelines developed by the Board of Education in consultation with the Department of Social Services that are relevant to the specific teacher licensure routes. Curriculum and instructional procedures for secondary grades 6-12 endorsements must include middle and secondary education. Pre-student teaching experiences (field experiences) should be evident within these skills. For preK-12, field experiences must be at the elementary, middle, and secondary levels.</p> <p>3. Instructional design based on assessment data: 3 semester hours. Skills in this area shall contribute to an understanding of the relationship among assessment, instruction, and monitoring student progress to include student performance measures in grading practices, the ability to construct and interpret valid assessments using a variety of formats in order to measure student attainment of essential skills in a standards based environment, and the ability to analyze assessment data to make decisions about how to improve instruction and student performancee.]</p> <p>4[3]. Classroom [and behavior] management: 3 semester hours. Skills in this area shall contribute to an understanding and application of classroom [and behavior] management techniques and individual interventions, including techniques that promote emotional well-being and teach and maintain behavioral conduct and skills consistent with norms, standards, and rules of the educational environment. This area shall address diverse approaches based upon behavioral, cognitive, affective, social and ecological theory and practice.</p> <p>4. Foundations of education: 3 semester hours. Skills in this area shall be designed to develop an understanding of the historical, philosophical, and</p>	
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		<p>sought. One year of successful full-time teaching experience in the endorsement area in a public or accredited nonpublic school may be accepted in lieu of the supervised teaching experience. A fully licensed, experienced teacher must be available in the school building to assist a beginning teacher employed through the alternate route.</p>	
200		<p>1. A baccalaureate degree from a regionally accredited college] or university or hold a Collegiate Professional License; and</p>	Clarification
380		<p>8 VAC 20-22-[370 380]. Health and physical education preK-12. <u>Endorsement requirements. The candidate must have:</u> <u>1. Graduated from an approved teacher preparation program in health, and physical education; or</u> <u>2. Completed a major in health and physical education or 45 semester hours of coursework distributed in the following areas:</u> <u>a. Personal health and safety: 6 semester hours;</u> <u>b. Human anatomy, physiology, and kinesiology: [9-12] semester hours;</u> <u>c. General health and physical education theory, including planning, administration, and assessment principles: 6 semester hours;</u> <u>d. Physical education methodology courses, including team, individual, adaptive, cooperative activities, rhythms and dance: 9 semester hours;</u> <u>e. Health methods course: 3 semester hours; and</u> <u>f. Health and physical education electives: [3-6 9] semester hours.</u></p>	Correction of semester hours required
390		<p>8 VAC 20-22-[380 390]. History and social sciences. <u>A. Endorsement requirements. The candidate must have:</u> <u>1. Graduated from an approved teacher preparation program in history and social sciences; or</u> <u>2. Completed [42 51] semester hours of coursework distributed in the following areas:</u> <u>a. History: a major in history or 18 semester hours in history (must include coursework in American history, Virginia history, and world history);</u> <u>b. Political science: [12 a major in political science or 18] semester hours in political science to include coursework in American government (state and local government);</u> <u>c. Geography: [6 9] semester hours; and</u> <u>d. Economics: 6 semester hours.</u></p>	Maintain current requirements for the history and social sciences endorsement based on public comment
		<p>[8 VAC 20-22-540. Special Education – Speech language pathology assistant preK-12. A. The speech language pathology assistant will provide speech language pathology support under the direction and supervision of a speech language pathologist. B. Endorsement Requirements. The candidate must have: 1. Completed a baccalaureate degree in speech language path 2. Completed a minimum of 500 clock hours in supervised e experiences in a public school setting supervised by an ASHA-certified speech language pathologist. One full year of successful, full-time experience as a speech language pathology assistant under the supervision of a</p>	Remove the Special Education Speech language pathology assistant preK-12 based on public comment

		<u>licensed speech language pathologist will be accepted in lieu of the 500 clock hours of supervised education experience.]</u>	
490		<p>8 VAC 20-22-[480 490]. Science – Earth science. <u>Endorsement requirements. The candidate must have:</u></p> <ol style="list-style-type: none"> <u>1. Graduated from an approved teacher preparation program in Earth science;</u> <u>2. Completed a major in geology or environmental science with at least one course in each of the following: oceanography, meteorology, and astronomy, [and a course in geology for environmental science majors] or 32 semester hours in Earth sciences, including geology (18 semester hours), oceanography, meteorology, and astronomy and other preparation consistent with the competencies required for the endorsement; or</u> <u>3. Earned an endorsement in another science discipline and at least 18 credits in Earth sciences, including preparation in each of the following areas: geology, oceanography, meteorology, and astronomy.</u> 	Revision to ensure that environmental science majors complete a course in geology.
590		<p>8 VAC 20-22-590. Administration and supervision preK-12.</p> <p><u>A. An endorsement in administration and supervision preK-12 consists of Level I, which is required to serve as a building-level administrator or central office supervisor, and Level II, which is an optional endorsement to which an experienced building-level administrator may aspire. Individuals must meet the requirements for the administration and supervision preK-12 endorsement through one of the [three four] options listed in this section [and be recommended by a Virginia school division superintendent]. A school leader's assessment prescribed by the Board of Education must be met for all individuals who are seeking an initial endorsement authorizing them to serve as principals and assistant principals in the public schools. Individuals seeking an initial administration and supervision endorsement who are interested in serving as central office instructional personnel are not required to take and pass the school leaders assessment prescribed by the Board of Education.</u></p> <p><u>B. Approved program route to Level I administration and supervision preK-12 endorsement. To become eligible for a Level I endorsement under this option, the candidate must have:</u></p> <ol style="list-style-type: none"> <u>1. A master's degree from a regionally accredited college or university;</u> <u>2. Completed three years of successful, full-time experience [as a classroom teacher] in a public school or accredited nonpublic school [in an instructional personnel position that requires licensure in Virginia];</u> <u>3. Completed an approved program in administration and supervision from a regionally accredited college or university;</u> <u>4. Completed a minimum of 320 clock hours of a deliberately structured and supervised internship that provides exposure to multiple sites (elementary, middle, high, central office, agency) with diverse student populations. These experiences shall be an integral component of a Virginia Board of Education approved</u> 	<p>Revisions were made in the administration and supervision preK-12 endorsement based on public comment. Experience was continued as a requirement for the routes to licensure.</p> <p>The alternate route to licensure was revised. There are two alternate routes of which one is restricted to an employing school division.</p>

		<p>preparation program. The internship must be focused on <u>[instructional leadership and]</u> learning for all students and must occur in a public school or accredited nonpublic school; and</p> <p>5. Satisfied the requirements for the school leaders licensure assessment prescribed by the Board of Education. Individuals seeking an initial administration and supervision endorsement who are interested in serving as central office instructional personnel are not required to take and pass the school leaders assessment prescribed by the Board of Education.</p> <p>C. Alternate route to Level I administration and supervision preK-12 endorsement <u>[restricted to the Virginia school division in which the superintendent submitted the recommendation for the endorsement. This endorsement is valid only in the designated Virginia school division and would not be portable and not reciprocal].</u> In order to be eligible for Level I endorsement under this option, the candidate must have:</p> <ol style="list-style-type: none"> 1. A master's degree from a regionally accredited college or university; 2. Completed graduate coursework <u>[addressing competencies]</u> in school law, evaluation of instruction, and other areas of study as required by an employing Virginia school superintendent; <u>[the graduate coursework must be taken from a regionally accredited college or university that has a state-approved administration and supervision program.]</u> 3. Completed three years of successful, full-time experience in a public school or accredited nonpublic school in an instructional personnel position that requires licensure in Virginia; <p>[34]. Satisfied the requirements for the school leaders licensure assessment specified by the Board of Education; and</p> <p>[45]. Been recommended by [a the] superintendent in [an the] employing Virginia school division.</p> <p><u>[D. Alternate route to Level I administration and supervision preK-12 endorsement. In order to be eligible for Level I endorsement under this option, the candidate must have:</u></p> <ol style="list-style-type: none"> 1. A master's degree from a regionally accredited college or university; 2. Completed graduate coursework in school law, evaluation of instruction, special education, school finance, and educational leadership, and other areas of study as required by an employing Virginia school superintendent; the graduate coursework must be taken from a regionally accredited college or university that has a state-approved administration and supervision program. 3. Completed three years of successful, full-time experience in a public school or accredited nonpublic school in an instructional personnel position that requires licensure in Virginia; 4. Satisfied the requirements for the school leaders licensure assessment specified by the Board of Education; and 5. Been recommended by the superintendent in the 	
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		<p><u>employing Virginia school division.]</u></p> <p><u>DE]. Out-of-state administration and supervision endorsement. The candidate must have:</u></p> <ol style="list-style-type: none"> <u>1. A master's degree from a regionally accredited college or university; and</u> <u>2. A current, valid out-of-state license (full credential)] with an endorsement in administration and supervision[7].</u> <p><u>EF]. Level II endorsement in administration and supervision preK-12. A building-level administrator may seek Level II endorsement in administration and supervision preK-12 after successfully serving as a building-level administrator for at least five years in a public school or accredited nonpublic school and successfully completing a formal induction program as a principal or assistant principal. In order to earn Level II endorsement, the candidate must meet two or more of the following criteria as specified by the Board of Education [and documented in a Department of Education approved format and be recommended by the employing Virginia school division superintendent]:</u></p> <ol style="list-style-type: none"> <u>1. Evidence of improved student achievement;</u> <u>2. Evidence of [effective] instructional leadership;</u> <u>3. Evidence of positive effect on school climate or culture;</u> <u>4. Earned doctorate in educational leadership or evidence of formal professional development in the areas of school law, school finance, supervision, human resource management, and instructional leadership; or</u> <u>5. Evidence of a completion of a high-quality professional development project designed by the division superintendent.</u> 	
690-760		<p><u>8 VAC 20-22-690. Revocation.</u></p> <p><u>A. A license issued by the Board of Education may be revoked for the following reasons:</u></p> <ol style="list-style-type: none"> <u>1. Obtaining or attempting to obtain such license by fraudulent means or through misrepresentation of material facts;</u> <u>2. Falsification of school records, documents, statistics, or reports;</u> <u>3. Conviction of any felony;</u> <u>4. Conviction of any misdemeanor involving moral turpitude;</u> <u>5. Conduct, [with a direct and detrimental effect on such as immorality, or personal condition detrimental to the health, welfare, discipline, or morale of students or to the best interest of the public schools of the Commonwealth of Virginia;]</u> <u>6. Misapplication of or failure to account for school funds or other school properties with which the licensee has been entrusted;</u> <u>7. Acts related to secure mandatory tests as specified in § 22.1-292.1 of the Code of Virginia;</u> <u>8. Knowingly and willfully with the intent to compromise the outcome of an athletic competition procures, sells, or administers anabolic steroids or causes such drugs to be procured, sold, or administered to a student who is a member of a school athletic team, or fails to report the use of such drugs by a student to the school principal and division superintendent as required by § 22.1-279.3:1 of</u> 	<p>Revisions made in these sections recommended to comply with the <u>Code of Virginia</u> and proper procedures</p>

		<p><u>the Code of Virginia. Any person whose administrative or teaching license is suspended or revoked by the board pursuant to this section shall be ineligible for three school years for employment in the public schools of the Commonwealth; or</u></p> <p><u>9. Other just cause [in the best interest of the public schools of the Commonwealth of Virginia good and just cause of a similar nature].</u></p> <p>B. Procedures.</p> <p><u>1. Submission of complaints. A complaint may be filed by anyone, but it shall be the duty of a division superintendent, principal or other responsible school employee to file a complaint in any case in which he has knowledge that a holder of a license is guilty of any offense set forth in subsection A of this section. The person making the complaint shall submit it in writing to the appropriate division superintendent.</u></p> <p><u>2. Action by division superintendent; investigation. Upon receipt of the complaint against the holder of a license, a division superintendent or his duly authorized representative shall investigate the charge. If, on the basis of such investigation, the division superintendent finds the complaint to be without merit, he shall so notify the complaining party or parties in writing and then close his file on the matter. This action shall be final unless the local school board, on its own motion, votes to proceed to a hearing on the complaint or unless circumstances are present making subsection A of this section applicable.</u></p> <p><u>C. Petition for revocation. Should the division superintendent or local school board conclude that there is reasonable cause to believe that a complaint against the holder of a license is well founded, the teacher shall be notified of the complaint by a written petition for revocation of a license signed by the division superintendent. A copy of such petition shall be sent by certified mail, return receipt requested, to the teacher's last known address. If not otherwise known, the last known address shall be the address shown in the records of the Department of Education.</u></p> <p><u>D. Form of petition. The petition for the revocation of a license shall set forth:</u></p> <ol style="list-style-type: none"> <u>1. The name and last known address of the person against whom the petition is being filed;</u> <u>2. The social security number of and the type of license and the license number held by the person against whom the petition is being filed;</u> <u>3. The offenses alleged and the specific actions that comprise the alleged offenses;</u> <u>4. The name and address of the party filing the original complaint against the license holder;</u> <u>5. A copy of the regulations containing a statement of the rights A statement of rights of] the person charged under this chapter. The statement of rights shall include notification to the person of the right to cancel the license if he chooses not to contest the charges. The statement must notify the individual that he shall receive a notice of cancellation that will include the statement: "The license holder voluntarily returned the license in response to a petition for revocation." The</u> 	
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		<p><u>individual also shall be notified that the cancellation of the license will be reported to division superintendents in Virginia and to chief state school officers of the other states and territories of the United States;] and</u></p> <p>6. Any other pertinent information.</p> <p>E. Filing of petition. The original petition shall be entered in the files of the local school board where the license holder is employed.</p> <p>F. Response to petition. The license holder shall present his written answer to the petition, if any, within 14 days after the date of service of the petition as certified by the United States Postal Service.</p> <p>1. If the teacher [responding to the petition states that he] does not wish to contest the charges, he may [cancel the license by returning the voluntarily return the]license to the division superintendent with a written, signed statement requesting cancellation. [The Superintendent of Public Instruction is authorized, upon receipt of the license holder's written, signed request from the division superintendent, to cancel the license.]The division superintendent shall forward the request for cancellation along with the petition for revocation to the Superintendent of Public Instruction within 14 days of receipt. The Superintendent of Public Instruction shall cancel the license and send a notice of cancellation by certified mail within 14 days of receipt of the request for cancellation.]</p> <p>2. If the license holder files a written answer admitting the charges, or refuses to accept the copy of the petition from the postal authorities, or fails to file a written answer within 14 days after service of the petition or has failed to provide postal authorities with a forwarding address so that the petition can be delivered, the local school board shall proceed to a hearing as described in subdivisions 3 and 4 of this subsection.</p> <p>3. If the license holder files his written answer denying the charges in the petition, the local school board shall provide a hearing at the time and place of its regular meeting or at such other reasonable time and place it may specify. The license holder or his representative, if any, shall be given at least 14 days' notice of the hearing.</p> <p>4. Following the hearing, the local school board shall receive the recommendation of the division superintendent and then either dismiss the charges or [recommend license revocation or suspension, make such recommendations as it deems appropriate relative to revocation of a license.]A decision to dismiss the charges shall be final, except as specified in subsection G of this section, and the investigative file on the charges shall be closed and [destroyed or]maintained as a separate [sealed] file under provision of the Code of Virginia.] Any record or material relating to the charges in any other file shall be [placed in the investigative file, removed or destroyed.] Should the local school board recommend the revocation or suspension of a license, [this recommendation, along with the investigative file, shall promptly be forwarded by the division superintendent to the Superintendent of</p>	
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		<p><u>Public Instruction</u>, the division superintendent shall forward the recommendation and the investigative file to the Superintendent of Public instruction within 14 days.]</p> <p>G. Revocation on motion of the Board of Education. The Board of Education reserves the right, <u>in situations not covered by this chapter,</u> to act directly <u>in revoking to revoke</u> a license <u>when the division superintendent or the local school board has not filed a petition for revocation and the Board of Education has reasonable cause to believe that subsection A of this section is applicable. The Superintendent of Public Instruction shall send a petition for revocation to the license holder as provided by subsection D of this section. The license holder shall the opportunity to respond to the petition or request cancellation of the license within 14 days of receipt.</u> <u>[1. If the license holder files a written answer admitting the charges, or refuses to accept the copy of the petition from the postal authorities, or fails to file a written answer within 14 days after service of the petition or has failed to provide postal authorities with a forwarding address so that the petition can be delivered, the petition shall be forwarded to the Board of Education for action.]</u> <u>No such revocation will be ordered without the involved license holder being given the opportunity [to appear at a for the] hearing specified in 8 VAC 20-22-740 B.</u> <u>[2. If the license holder timely files his written answer denying the charges in the petition, the Superintendent of Public Instruction shall schedule a hearing with the investigative panel provided in 8 VAC 20-21-740. The license holder or his representative, if any, shall be given at least 14 days' notice of the hearing. The investigative panel shall take action on the petition as specified in 8 VAC 20-21-740. No revocation will be ordered without the involved license holder being given the opportunity to appear at a hearing specified in 8 VAC 20-21-740C.]</u> <p>H. Reinstatement of license. A license that has been revoked may be reinstated by the Board of Education after five years if the board is satisfied that reinstatement is in the best interest of the former license holder and the public schools of the Commonwealth of Virginia. The individual must apply to the board for reinstatement. Notification to all appropriate parties will be communicated in writing by the state agency.</p> <p>8 VAC 20-22-700. Cancellation. A. A license may be canceled by <u>[the] voluntary return [of the license] by the [license holder individual, or for reasons listed under 8 VAC 20-22-690 A or for the following reason:]</u> <u>[The teacher in his answer to the petition, as described in 8 VAC 20-22-690 F 1, states that he does not wish to contest the charges.]</u>Reasons for cancellation are the same as those listed under 8 VAC 20-22-690 A.</p> <p>B. Procedures. The individual may voluntarily return the license to the division superintendent <u>for the Superintendent of Public Instruction following revocation on motion by the Board of Education]</u> with a written, signed statement requesting cancellation. <u>[The individual shall acknowledge in the request that he understands that</u></p> </p>	
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		<p><u>Virginia.</u></p> <p><u>B. Procedures.</u></p> <p><u>1. Submission of complaints. A complaint may be filed by anyone, but it shall be the duty of a division superintendent, principal, or other responsible school employee to file a complaint in any case in which he has knowledge that [the license holder has committed a holder of a license is guilty of]any offense set forth in subsection A of this section. The person making the complaint shall submit it in writing to the appropriate division superintendent.</u></p> <p><u>2. Action by division superintendent; investigation. Upon receipt of the complaint against the holder of a license, a division superintendent or his duly authorized representative shall investigate the charge. If, on the basis of such investigation, the division superintendent finds the complaint to be without merit, he shall so notify the complaining party or parties in writing and then close his file on the matter. This action shall be final unless the local school board on its own motion votes to proceed to a hearing on the complaint or unless circumstances are present making subsection C of this section applicable.</u></p> <p><u>C. Petition for suspension. Should the division superintendent or local school board conclude that there is reasonable cause to believe that a complaint against the holder of a license is well founded, the teacher shall be notified of the complaint by a written petition for suspension of a license signed by the division superintendent. A copy of such petition shall be sent by certified mail, return receipt requested, to the teacher's last known address. If not otherwise known, the last known address shall be the address shown in the records of the Department of Education.</u></p> <p><u>D. Form of petition. The petition for the suspension of a license shall set forth:</u></p> <p><u>1. The name and last known address of the person against whom the petition is being filed;</u></p> <p><u>2. The social security number and the type of license [and the license number] held by the person against whom the petition is being filed;</u></p> <p><u>3. The offenses alleged and the specific actions that comprise the alleged offenses;</u></p> <p><u>4. The name and address of the party filing the original complaint against the license holder;</u></p> <p><u>5. A statement of the rights of the person charged under this chapter;. The statement of rights shall notify the person of the right to cancel the license if he chooses not to contest the charges. The statement also shall notify the individual that the license may be suspended for up to five years and that he shall receive a notice of cancellation that will include the statement: "The license holder voluntarily returned the license in response to a petition for suspension." The individual also shall be notified that the cancellation and period of suspension will be reported to division superintendents in Virginia and to chief state school officers of the other states and territories of the United States;] and</u></p> <p><u>6. Any other pertinent information.</u></p>	
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		<p><u>E. Filing of petition. The original petition shall be entered in the files of the local school board where the license holder is employed.</u></p> <p><u>F. Response to petition. The license holder shall present his written answer to the petition, if any, within 14 days after the date of service of the petition as certified by the United States Postal Service.</u></p> <p><u>1. If the teacher [responding to the petition states that he] does not wish to contest the charges, he may voluntarily return his cancel the license [by returning the license] to the division superintendent with a written and signed statement requesting [cancellation suspension. The Superintendent of Public Instruction is authorized, upon receipt of the license holder's written, signed request from the division superintendent, to cancel the license.] The division superintendent shall forward the request for cancellation along with the petition for suspension to the Superintendent of Public Instruction within 14 days of receipt. The Superintendent of Public Instruction shall cancel the license and send the person a notice of cancellation along with the time period for the suspension by registered mail within 14 days of receipt of the request for cancellation.]</u></p> <p><u>2. If the license holder files a written answer admitting the charges, or refuses to accept the copy of the petition from the postal authorities, or fails to file a written answer within 14 days after service of the petition, or has failed to provide postal authorities with a forwarding address so that the petition can be delivered, the local school board shall proceed to a hearing as described in subdivisions 3 and 4 of this subsection.</u></p> <p><u>3. If the license holder files his written answer denying the charges in the petition, the local school board shall provide a hearing at the time and place of its regular meeting or at such other reasonable time and place it may specify. The license holder or his representative, if any, shall be given at least 14 days' notice of the hearing.</u></p> <p><u>4. Following its hearing, the local school board shall receive the recommendation of the division superintendent and then either dismiss the charges or make such recommendations relative to suspension of a license as it deems appropriate. A decision to dismiss the charges shall be final, except as specified in subsection G of this section, and the file on the charges shall be closed and all materials expunged. Should the local school board recommend the suspension of a license, this recommendation, along with supporting evidence, shall promptly be forwarded by the division superintendent to the Superintendent of Public Instruction.</u></p> <p><u>G. Suspension on motion of Board of Education. The Board of Education reserves the right, in situations not covered by this chapter, to act directly in suspending a license. No such suspension will be ordered without the involved license holder being given the opportunity for the hearing as specified in 8 VAC 20-22-740[B C].</u></p>	
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		<p><u>H. Reinstatement of license. A license may be suspended for a period of time not to exceed five years. The license may be reinstated by the Department of Education, upon request, with verification that all requirements for license renewal have been satisfied. The individual must apply to the board for reinstatement. Notification to all appropriate parties will be communicated in writing by the Department of Education.</u></p> <p><u>8 VAC 20-22-720. Denial.</u> <u>A. A license may be denied for the following reasons:</u></p> <ol style="list-style-type: none"> <u>1. Attempting to obtain such license by fraudulent means or through misrepresentation of material facts;</u> <u>2. Falsification of records or documents;</u> <u>3. Conviction of any felony;</u> <u>4. Conviction of any misdemeanor involving moral turpitude;</u> <u>5. Conduct, [with a direct and detrimental effect on such as immorality, or personal condition detrimental to the health, welfare, discipline, or morale of students or to the best interest of the public schools of the Commonwealth of Virginia;]</u> <u>6. Revocation, suspension, or invalidation of the license by another state or territory; or</u> <u>7. Other good and just cause of a similar nature.</u> <p><u>B. Expired license. The holder of a license that has expired may be denied renewal or reinstatement by the Superintendent of Public Instruction for any of the reasons specified in 8 VAC 20-22-690 A. No such denial will be ordered unless the license holder is given the opportunity for the hearing specified in 8 VAC 20-22-740[B, C].</u></p> <p><u>8 VAC 20-22-730. Right to counsel and transcript.</u> <u>A license holder shall have the right, at his own expense, to be represented by [an attorney or other representative counsel of choice] at the local school board hearing provided for in 8 VAC 20-22-690 F[, the investigative panel hearing provided for in 8 VAC20-22-740A,] or in the proceedings before the Board of Education, as specified in 8 VAC 20-22-740 A [and B]. [The hearing before the local school board and the investigative panel hearing provided in 8 VAC 20-22-740A shall be recorded, and upon written request, the license holder shall be provided a transcript of the hearing at his own expense.] [Counsel may, but need not, be an attorney.] Any such hearing before a local school board and any hearing before the Board of Education shall be recorded; and, upon written request, the party charged shall be provided a hearing transcript without charge.</u></p> <p><u>8 VAC 20-22-740. Action by the State Superintendent of Public Instruction and the Board of Education.</u> <u>A. [Superintendent’s Investigative Panel: Superintendent’s Recommendation.] Upon receipt of the complaint from the local school division, the Superintendent of Public Instruction will ensure that an investigative panel at the state level reviews the petition. The panel shall consist of three to five members selected by the Assistant Superintendent of Teacher Education and Licensure of the Virginia Department of Education. The license holder [shall should] be notified within 14 days of the receipt of the</u></p>	
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		<p><u>complaint to the Department of Education as to the date, time, and location of the hearing. [The Department of Education shall ensure that the license holder receives all documentation that will be used during the investigative panel hearing prior to the hearing.] [Both parties, A representative of] the local school division and the license holder, are entitled to be present with counsel [and witnesses] if so desired. [The investigative panel hearing shall be recorded.] [Individuals requesting a license or the continuation of a license must appear before the Superintendent's Investigative Panel.] The recommendation of the [investigative state-level] panel is made to the State Superintendent of Public Instruction [who will forward his recommendation and the license holder's file for presentation] to the State Board of Education [or its duly designated committee at one of its scheduled meetings]. [The superintendent shall then present his report to the Board of Education or its duly designated committee at one of its duly scheduled meetings.] The license holder shall be given at least 14 days' notice [in the manner specified in 8 VAC 20-22-690 F) of [the State Board of Education meeting when his case will be considered.] [the date on which the Superintendent of Public Instruction's report will be continued, where necessary, from one meeting of the Board of Education or committee to another.] [Following the investigative panel hearing, the Department of Education shall forward the recommendation of the investigative panel and the license holder's file to the license holder as soon as practicable, but no later than 14 days prior to the scheduled State Board of Education meeting when his case will be considered.]</u></p> <p><u>B. The State Superintendent of Public Instruction is authorized to approve the issuance of licenses for individuals who have misdemeanor convictions related to drugs based on a review of the cases. No individual would be denied a license without a hearing of the Board of Education as required in 8 VAC 20-22-740 B.</u></p> <p><u>C. [State Board of Education] Hearing. The Board of Education, or its duly designated committee, shall [receive and] consider the [recommendation report] of the Superintendent of Public Instruction and such relevant and material evidence as the license holder may desire to present at the hearing. [At its discretion, the Board of Education may ask the license holder questions.] At the conclusion of the hearing, [the Board of Education will announce its decision. the Superintendent of Public Instruction may recommend the action — revocation or suspension — that should be taken by the Board of Education. The Board of Education will then enter its order within 14 days after the hearing has concluded. This order will contain findings of fact either sustaining or dismissing the complaint.]</u></p> <p><u>[D. Decision not to revoke or suspend. If the decision of the Board of Education is not to revoke or suspend the license, the license holder and the principal complainants will be so notified and the Board of Education's file and any other record or material will be removed or</u></p>	
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		<p><u>destroyed.</u></p> <p><u>E. Decision to revoke or suspend. If the decision of the Board of Education is to revoke or suspend the license, a written order will be entered in the minutes of the meeting at which the matter was decided. A copy of this order will be sent to the license holder and the principal complainants.]</u></p> <p><u>[D. The decision of the State Board of Education shall be recorded in the minutes of the meeting, and the license holder and principal complainants will receive written notice of the decision.]</u></p> <p><u>8 VAC 20-22-750. Right of license holder to appear at hearing.</u></p> <p><u>A license holder shall have the right to appear in person at the hearings held by the local school board, Board of Education, or board committee described in this part unless he is confined to jail or a penal institution. The local school board or Board of Education, at its discretion, may continue such hearings for a reasonable time if the license holder is prevented from appearing in person for reasons such as documented medical or mental impairment.</u></p> <p><u>8 VAC 20-22-760. Notification.</u> <u>Notification of the revocation, [cancellation,] denial, or reinstatement of a license shall be made by the Superintendent of Public Instruction, or his designee, to division superintendents in Virginia and to chief state school officers of the other states and territories of the United States.</u></p>	
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Public comment

Please summarize all comments received during the public comment period following the publication of the proposed stage, and provide the agency response. If no comment was received, please so indicate.

Committer	Comment	Agency response
See attached	See attached	<p>Extensive public comment was received on many parts of the of proposed revisions to the <i>Regulations Governing the Licensure of School Personnel</i> as reflected in the attached table. This is a summary of comments received by topic:</p> <p>Administration and Supervision</p> <p>Comments received – 82</p> <p>Extensive comments were received concerning the proposed changes to the Administration and Supervision endorsement. The bulk of the comments concerned the proposed changes in the internship</p>

		<p>requirements for approved programs and the proposed alternate route for administrative endorsement.</p> <p>Many commentators expressed concern regarding the increased hours proposed for administrative internship. They felt that the increase might discourage qualified teachers from seeking an administrative endorsement because the requirement would be difficult to meet while remaining employed full-time. Others, however, thought that the proposed internship was a step in the right direction towards connecting academic programs to real field experience as well as “real life” experience. One comment suggests that an additional requirement relating to special education programs and procedures be added to all administrative licensure programs. Another offered the suggestion that a fully funded year-long internship be required.</p> <p>A variety of concerns were expressed concerning the proposed alternate route for administrative endorsement. The lack of a teaching experience requirement was seen as a major shortcoming, and many of those citing this problem did so within the context of discussing the role of the principal as an instructional leader. Other comments questioned whether those without degrees or educational coursework would have sufficient understanding of special education, school law, evaluation of instruction, school safety or a number of other issues. Others feared that student learning would suffer because of unqualified or untrained school leaders. Concern was expressed that an individual receiving an alternate license based on the recommendation of one Superintendent would be free to move to other areas or out of state once receiving this full license. A variety of remedies were recommended, including a more restrictive list of masters degrees that could be accepted, a more extensive list of coursework requirements, a mandatory probationary or internship period, or limiting this type of appointment to a local license that would not be portable to other Virginia school divisions or out of state. The lack of a required internship for the alternate route might also encourage those in approved programs to circumvent their approved program by seeking licensure through an alternate route.</p> <p>Some voiced support for the concept of an alternate route, but also offered a revised set of criteria (see pages 5, 12, and 13 for different examples). Others support the idea of an alternate route program combined with special mentoring and training.</p> <p>Support was offered for the proposed two-tier licensure system for administrators and increased evaluation and oversight of existing approved programs. Programs were also urged to provide sufficient resources for adjunct faculty teaching in administrative programs.</p> <p><u>AGENCY RESPONSE:</u> The experience requirement was continued for the endorsement; however, it was changed from “teaching” experience to experience in an instructional personnel position that requires licensure in</p>
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		<p>Virginia. The number of hours for the internship for the endorsement was changed to 320 hours.</p> <p><u>Speech-Language Pathologist Assistants – 8VAC20-22-540; 8VAC20-22-670</u></p> <p>Comments received – 83</p> <p>Numerous comments were received supporting the movement of the Speech-Language Pathologist endorsement to a Pupil Personnel License. This move will remove the requirement for pathologists to pass the Praxis I examination. Others requested that the name of the endorsement be changed to Speech-Language Pathologist instead of Speech-Language Disorders.</p> <p>Numerous comments were also received opposing the proposed endorsement for the Speech-Language Pathologist Assistant, including comments from practicing pathologists, university preparation programs, and professional organizations. Those opposing the endorsement stated that individuals with bachelor’s degree preparation were not qualified to carry caseloads or deliver speech-language services to students. They do not have sufficient training for independent practice. School cases now often involve severely impaired students needed services that only an individual with master’s degree training can provide. If they are placed in positions in school divisions, they would have to be extensively supervised by the fully-licensed pathologists, adding to their already heavy workload. Concern was expressed that the assistants would be misplaced and misused, causing harm to children. There would be great potential for abuse of these new positions, and fully-licensed pathologists might be asked to engage in unethical practices. There was also concern that having assistants would deter individuals with bachelor’s degrees from seeking further education while at the same time discouraging fully endorsed pathologists from joining school divisions, compounding the shortage problem rather than helping it.</p> <p><u>AGENCY RESPONSE:</u> The endorsement was removed from the proposed regulations.</p> <p><u>History and Social Studies Requirements – 8VAC20-22-380</u></p> <p>Comments received - 17</p> <p>All (100%) of those offering comment were opposed to changing the endorsement requirements for History and Social Studies. Many were particularly opposed to lowering the geography requirement in light of the quantity of geography in the curriculum and role that global knowledge and international interactions may play in our students’ future.</p> <p><u>AGENCY RESPONSE:</u> The requirements for the history and social studies will remain as the current regulations stipulate. Proposed language was stricken.</p>
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		<p><u>Change in Student Teaching/Field Experience Requirements – 8VAC20-542-10</u></p> <p>Comments received – 7</p> <p>A number of different comments were offered. Three large teacher preparation programs (ODU, Longwood and Virginia Tech) expressed concern over increasing the number of required hours for field experiences from 300 to 500 and student teaching hours from 150 to 300. They stated that there is no firm research base behind this decision nor any federal mandate. Concern was expressed that public schools would not be willing to turn over their classrooms to novice teachers for the additional hours due to increased accountability. Concern was expressed that the wording of the new regulations inadvertently excludes that use of on-campus teaching training facilities such as campus child development centers. It was also suggested that the definition for field placements be expanded to include state facilities (such as the Department of Correctional Education) and in accredited private schools.</p> <p><u>AGENCY RESPONSE:</u> The student teaching hours will remain as the current regulations stipulate. The additional hours will not be required.</p> <p><u>Foundations of Education</u></p> <p>Comments received – 34 plus a petition representing an additional 621 individuals.</p> <p>There was extensive feedback on the proposal to eliminate the Foundations of Education requirement from professional studies, with 100% of the comments opposing the elimination of the Foundations requirement. College faculty, professional organizations, school division personnel, and preservice teachers all commented on the critical role that the foundations course plays in the preparation of classroom teachers, and that fact that its unique curriculum does not fit well into any of the remaining professional studies requirements.</p> <p><u>Instructional Design Based on Assessment Data</u></p> <p>Comments received – 5</p> <p>Three commentators recommended that the language in the requirement be revised and offered suggestions. Two others thought that preparation in this area was needed.</p> <p><u>AGENCY RESPONSE:</u> The Foundations of Education requirement will continue. The competencies of instructional design based on Assessment Data were incorporated into the requirements of Curriculum and Instructional Procedures and Foundations of Education.</p> <p><u>Dating of Licenses – 8VAC20-22-50</u></p>
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		<p style="text-align: center;">Comments received – 6</p> <p>While only six comments received concerning the dating of licenses, these comments should be reviewed in conjunction with the comments on Testing in the First Year of the Provisional License since the two topics are linked together. One non-school division comment was received supported the change. The remaining comments, including two from the state’s larger school divisions (Fairfax and Virginia Beach) opposed the change, citing the increased burden it would place on both local school divisions and DOE staff. In essence, the change would mean that every Provisional license would have to be issued twice. Concern was also expressed regarding the fact that this revision would unnecessarily disrupt student learning at irregular intervals if teachers had to be dismissed during the school year for failure to meet testing requirements (see below). The proposed change in regulations is also not in sync with the requirement in the Code of Virginia that teachers be notified of non-renewal by April 15 of each year.</p> <p><u>AGENCY RESPONSE:</u> The current dating of licenses will not be changed. The proposed language would be a burden on school divisions, teachers, and students; therefore, the proposed language was stricken.</p> <p><u>Changes in Out-of-State Exemption from Testing – 8VAC20-22-100</u></p> <p style="text-align: center;">Comments received – 21</p> <p>While two comments in support of changing the exemption requirement for out-of-state teachers were received, the remaining 19 were opposed to the change. Among those voicing opposition were school divisions that recruit extensively outside of Virginia to fill vacancies, including Virginia Beach, Newport News, Prince William, Fairfax and Norfolk. They all expressed concern that changing the exemption requirement would seriously hamper their recruiting efforts.</p> <p><u>AGENCY RESPONSE:</u> The proposed revisions were approved by the Board of Education. The exemption criteria were changed from two years to three years (and requiring an out-of-state license). This is more equitable to in-state teachers, and aligns with statutory requirements for three years of experience to be considered for continuing contract status.</p> <p><u>Testing in First Year of Provisional License – 8VAC20-22-40</u></p> <p style="text-align: center;">Comments received – 22</p> <p>All (100%) of the comments received opposed this change in the regulations. Among those commenting were the Virginia Association of School Personnel Administrators and several large school divisions including Virginia Beach, Prince William, Norfolk, and Fairfax. This change would put an unnecessary burden on</p>
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		<p>both school divisions and DOE staff in that it would essentially require that all Provisional Licenses be issued twice, once for the testing year, and then again if the tests were passed for the additional two years to allow for completion of coursework. There was also concern that there were not sufficient test dates available to allow individuals to take all of the required tests and meet the April 15 notification requirement for non-renewal. Similar concerns regarding the disruption of instruction were offered as they were under the Dating of License section.</p> <p>AGENCY RESPONSE: The dating of licenses will not change. Individuals will continue to have three years to take assessments.</p> <p><u>School Manager License</u></p> <p>Comments received – 3</p> <p>The three comments received were in support of this new license type.</p> <p>AGENCY RESPONSE: The school manager license was approved.</p> <p><u>Middle School Single Subject Endorsement – 8VAC20-22-160</u></p> <p>Comments received – 23</p> <p>All (100%) of those commenting were in support of moving to a single subject endorsement for middle school teachers.</p> <p>AGENCY RESPONSE: The middle school single subject endorsement was approved.</p> <p><u>Adding Endorsements By Testing – 8VAC20-22-70</u></p> <p>Comments received – 28</p> <p>One neutral comment was provided generally supporting the concept and offering assistance with the process, while the remaining 27 comments were in support of the additional of endorsements (except elementary and special education) through testing.</p> <p>AGENCY RESPONSE: The Board of Education approved adding endorsements by testing.</p> <p><u>Changes in Coursework Requirements – 8VAC20-22-130 through 500</u></p> <p>Comments received – 17</p> <p>There were a variety of comments in this section. Those relating to specific endorsements are summarized under that specific heading. Some comments support the change as long as they are clearly explained to stakeholders. Many took issue with the specific mandates</p>
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		<p>for courses in classroom management and data-based instructional decision making, preferring instead to integrate the content into existing courses, while others praised the requirement for a required classroom management course.</p> <p>AGENCY RESPONSE: These comments were on a variety of areas. The professional studies requirements were revised based on public comment.</p> <p>Career Paths to Teaching</p> <p style="text-align: center;">Comments received – 18</p> <p>Two comments were generally positive, and two additional comments thought that career paths might be a good idea but didn't think the proposal was sufficient as it did not include any financial reward. The remaining comments were generally negative, expressing concern about the lack of consistency in identifying recipients, the lack of funding to go along with the recognition, the potential conflict with other local systems of recognition already in place, the fact that the proposal did not reflect the wishes of exemplary teachers, and the potential for confusion about these designations and the already complex system of licensing.</p> <p><u>AGENCY RESPONSE:</u> The career paths to teaching were approved. They are voluntary career paths that may be designated on a license.</p> <p>Alternate Routes to Licensure</p> <p style="text-align: center;">Comments received – 6</p> <p>One commentator praised the experiential route to licensure. One commentator made suggestions concerning add-on endorsements in science being extended to middle school educators. The remaining comments focused on concerns about the lack of consistency in alternate routes and the strong desire for a level playing field in which standards for licensure were consistent across all possible routes.</p> <p><u>AGENCY RESPONSE:</u> Experiential learning was approved.</p> <p>Changes in Health and PE Endorsement</p> <p style="text-align: center;">Comments received – 1</p> <p>One respondent expressed concern over possible confusion that could arise over the proposed new wording in the Health and PE endorsement and make recommendations to clarify this issue.</p> <p><u>AGENCY RESPONSE:</u> The hours for the endorsement were clarified in the regulations.</p> <p><u>Special Education Endorsement Changes – 8VAC20-542-470; 8VAC250-22-520 and 530</u></p>
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		<p style="text-align: center;">Comments received – 30</p> <p>The proposed changes in Special Education endorsement generated a number of comments. Only one commentator was against the proposed change, stating that the change could drive away teachers who had a strong desire to work with only one disability. Most comments were generally positive about the new endorsements, noting that the new endorsements would be more aligned with the practices of other states, would reflect the practice of combining disabilities in school classrooms, and would provide more flexibility. Two commentators proposed further designations among adapted and general curriculum to include elementary and secondary designations. Two commentators supported the concept of a fifteen semester add-on endorsement for special education for those with elementary endorsements. Two comments were received regarding use of the word “aligned” rather than “adapted” to be consistent with language already in use by DOE. Several commentators also proposed that general educators be required to take some special education coursework as part of their professional studies.</p> <p>AGENCY RESPONSE: The proposed revisions were approved.</p> <p><u>Changes in Licensure Renewal – 8VAC20-22-110</u></p> <p style="text-align: center;">Comments received – 8</p> <p>One commentator asked that excess renewal points be rolled over to the next renewal cycle. The remaining 7 commentators supported the proposed changes.</p> <p>AGENCY RESPONSE: The revisions in the renewal requirements were approved.</p> <p><u>International Educator’s License – 8VAC20-22-50</u></p> <p style="text-align: center;">Comments received – 4</p> <p>All commentators supported the new International Educator’s License.</p> <p><u>AGENCY RESPONSE:</u> The International Educator’s License was approved.</p> <p><u>Mathematics Specialist – 8VAC20-22-10</u></p> <p style="text-align: center;">Comments received – 3</p> <p>All comments received were in support of the Mathematics Specialist endorsement.</p> <p><u>AGENCY RESPONSE:</u> The Mathematics Specialist endorsement was approved.</p> <p><u>Changes in Earth Science Endorsement – 8VAC20-22-</u></p>
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		<p><u>480</u></p> <p>Comments received – 1</p> <p>The commentator noted a possible oversight in the new endorsement description that would allow an Earth science endorsement without any geology coursework and proposed a change in wording that would correct this problem.</p> <p>AGENCY RESPONSE: The regulations were revised to ensure that environmental science majors would complete a course in Earth science.</p> <p><u>Early Childhood Education</u></p> <p>Comments received – 3</p> <p>Individuals working with the Board of Education’s Early Childhood Grant Committee are proposing a new, separate endorsement in early childhood education ages three to four.</p> <p>AGENCY RESPONSE: The Early Childhood for Three- and Four-Year Olds (add-on endorsement) was approved.</p>
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Enter any other statement here

All changes made in this regulatory action

Please detail all changes that are being proposed and the consequences of the proposed changes. Detail new provisions and/or all changes to existing sections.

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
Repealed	10	Repealed	Definitions of new license types are incorporated in this section. Definition of Experiential Learning was added.
Repealed	20	Repealed	Reference to modification of college and university programs is removed from the proposed regulations (reference will be inserted the proposed Regulations Governing the Review and Approval of Education Programs in Virginia, which are also undergoing revision at this time).
Repealed	40	Repealed	The number of years of teaching experience to exempt an individual from all professional teacher’s assessments has been increased from two to three years, and individuals also must hold a valid out-of-state license (full credential with no deficiencies) to be exempted. [Current regulations require two years of teaching experience and no out-of-state license.] Individuals seeking initial licensure must demonstrate

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
			<p>proficiency in the use of educational technology for instruction, complete study in child abuse recognition and intervention in accordance with curriculum guidelines developed by the Board of Education in consultation with the Department of Social Services, and receive professional development in instructional methods tailored to promote student academic progress and effective preparation for the Standards of Learning end-of-course and end-of-grade assessments.</p>
Repealed	50	Repealed	<p>The names of licenses offered are as follows. The Eligibility License and Special Education Conditional License will be incorporated under the Provisional License. The School Manager License and International License were added.</p> <p>Provisional License Collegiate Professional License Postgraduate Professional License Technical Professional License Pupil Personnel Services License School Manager License (new license type) Division Superintendent License International Educator License (new license type)</p> <p>A Virginia employing education division or agency is required to notify employees in writing at the time of employment of the need to meet appropriate assessment requirements for licensure.</p>
Repealed	60	Repealed	<p>This section of the regulations will establish the following designations on licenses to reflect stages in the professional development of teachers and promote continuing growth and career paths as educators. Criteria and implementation of procedures will be set forth by the Virginia Department of Education. These designations will not apply to the Division Superintendent License, School Manager, International License, or the Pupil Personnel Services License.</p> <ol style="list-style-type: none"> 1. Career Teacher: This teacher designation will be issued on a renewable teaching license for individuals who have gained continuing contract status in Virginia. 2. Mentor Teacher: This voluntary teacher designation will be issued on a renewable teaching license for individuals who have achieved the career teacher designation; received a recommendation for the designation from an employing Virginia school division superintendent or designee or accredited nonpublic school head; served at least three years as a mentor teacher in Virginia; documented responsibilities as a mentor; and completed a local or state mentor teacher training program in accordance with the Board of Education requirements for mentor teachers. 3. Teacher as Leader: This voluntary teacher designation will be issued on a renewable teaching license for individuals who have achieved the career teacher designation; completed at least five years of

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
			<p>successful, full-time teaching experience in a Virginia public school or accredited nonpublic school; received the recommendation from an employing Virginia school division superintendent or designee or accredited nonpublic school head; and completed one of the following:</p> <ul style="list-style-type: none"> a. National Board Certification or a nationally recognized certification program approved by the Board of Education and a recommendation from an employing Virginia school division superintendent or designee or accredited nonpublic school head and documentation in an approved Department of Education format verifying the individual’s demonstrated skills and abilities as a school leader and direct contributions to school effectiveness and student achievement; or b. a recommendation from an employing Virginia school division superintendent or designee or accredited nonpublic school head and documentation in an approved Department of Education format verifying the individual’s demonstrated skills and abilities as a school leader and direct contributions to school effectiveness and student achievement.
Repealed	70	Repealed	<p>An individual who holds a teaching license may add an additional endorsement to the license by passing a rigorous academic subject test prescribed by the Board of Education. This testing option does not apply to individuals who are seeking an early/primary prek-3 or elementary education prek-6 endorsement or who hold a technical professional license, vocational evaluator license (no longer issued), pupil personnel services license, a school manager license, or a division superintendent license.</p>
Repealed	90	Repealed	<p>Individuals seeking initial licensure through an alternate route may substitute experiential learning in lieu of coursework in accordance with criteria and procedures established by the Board of Education. The specific criteria are outlined.</p>
Repealed	100	Repealed	<p>Licensure by reciprocity is provided for individuals who have obtained a valid out-of-state license (full credential without deficiencies) that is in force at the time the application for a Virginia license is received by the Department of Education. The individual must establish a file in the Department of Education by submitting a complete application packet, which shall include official student transcripts. The number of years of teaching experience to exempt an individual from all professional teacher’s assessments has been increased from two to three</p>

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
			years, and individuals also must hold a valid out-of-state license (full credential with no deficiencies) to be exempted. [Current regulations require two years of teaching experience and no out-of-state license.]
Repealed	110	Repealed	<p>Renewal activities must be based on an individualized professional development plan that includes ongoing, sustained, and high-quality professional development. Definitions of the renewal options have been incorporated in the regulations.</p> <p>Peer observation and educational travel have been eliminated as renewal options.</p>
Repealed	130	Repealed	<p>Proposed coursework in professional studies is as follows: three-semester-hours in human growth and development, three-semester-hours in curriculum and instructional procedures, three semester hours in foundations of education, three semester hours in classroom and behavior management, and six semester hours in reading. Competencies in instructional design based on assessment data have been incorporated into the curriculum and instructional procedures and foundations of education coursework. The professional studies requirements may be taught in integrated coursework or modules.</p> <p>Professional studies competencies were revised to strengthen competencies for early childhood education.</p>
Repealed	140	Repealed	<p>An add-on endorsement in Early Childhood for Three- and Four-Year Olds is proposed.</p> <p>The add-on endorsement to an elementary endorsement (such as prek-3 and prek-6) is not required to teach prek (three- and four-year olds), but the endorsement recognizes the candidate’s additional preparation in early childhood.</p>
Repealed	150	Repealed	Additional computer technology coursework will not be required because teachers are required by the Code of Virginia to meet the Technology Standards for Instructional Personnel as established by the Board of Education.
Repealed	160	Repealed	Additional computer technology coursework will not be required because teachers are required by the Code of Virginia to meet the Technology Standards for Instructional Personnel as established by the Board of Education.
Repealed	170	Repealed	The middle education 6-8 endorsement may be issued in at least one area of concentration. [Currently, two areas of concentration are required.]
Repealed	190	Repealed	Proposed coursework in professional studies is as follows: three-semester-hours in human growth and development, three-semester-hours in curriculum and instructional procedures, three semester hours in foundations of education, three semester hours in classroom and behavior management, and six semester hours in reading. Competencies in instructional design based on assessment data have been incorporated into the curriculum and instructional procedures and

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
			foundations of education coursework. The professional studies requirements may be taught in integrated coursework or modules.
Repealed	220	Repealed	The name of the endorsement is proposed to be changed from Vocational education-agricultural education to Career and technical education--agricultural education.
Repealed	230	Repealed	The name of the endorsement is proposed to be changed from Vocational education-business education to Career and technical education -- business and information technology. Endorsement requirements are proposed to be changed to reflect contemporary business terminology.
Repealed	240	Repealed	The name of the endorsement is proposed to be changed from Vocational education-work and family studies to Career and technical education--family and consumer sciences.
Repealed	250	Repealed	The name of the endorsement is proposed to be changed from Vocational education-health occupations education to Career and technical education--health and medical sciences.
Repealed	260	Repealed	The name of the endorsement is proposed to be changed from Vocational education- industrial cooperative training to Career and technical education--industrial cooperative training.
Repealed	270	Repealed	The name of the endorsement is proposed to be changed from Vocational education-marketing education to Career and technical education--marketing education.
Repealed	280	Repealed	The name of the endorsement is proposed to be changed from Vocational education-technology education to Career and technical education-technology education.
Repealed	290	Repealed	The name of the endorsement is proposed to be changed from Vocational education-trade and industrial education to Career and technical education-trade and industrial education.
Repealed	300	Repealed	The name of the endorsement is proposed to be changed from Vocational education-vocational special needs to Career and technical education-vocational special needs.
Repealed	320	Repealed	The name of the endorsement is proposed to be changed from Dance prek-12 to Dance arts prek-12.
Repealed	330	Repealed	The number of minimum hours of in-car instruction is proposed to be changed from 20 to 14 hours of actual behind-the-wheel supervised teaching experience and 2 hours of basic evasive maneuvers is proposed to be added.
Repealed	340	Repealed	The descriptor for the advanced composition course is proposed to be changed from “expository and technical writing” to “expository and informational writing.”
Repealed	350	Repealed	Currently six semester hours of electives are required for the endorsement. A revision is proposed to change the electives to 3 semester hours and designate the additional 3 semester hours to be taken in the teaching of reading. A descriptor for the teaching of reading requirements is proposed to be added.

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
Repealed	360	Repealed	<p>Native speakers or candidates who have learned a foreign language without formal academic credit in a college or university will have the option of achieving a qualifying score on a foreign language assessment in the appropriate language as prescribed by the Board of Education.</p> <p>Native speakers or candidates who have learned American Sign Language without formal academic credit in a college or university will have the option of demonstrating proficiency by completing requirements of an assessment in American Sign Language prescribed by the Board of Education.</p>
Repealed	380	Repealed	<p>The health methods requirement is proposed to be changed from 6 semester hours to 3 semester hours. The health and physical education electives requirement is proposed to be changed to 9 semester hours.</p>
Repealed	410	Repealed	<p>The following underlined language is proposed to be added as a descriptor to the six semester hours in keyboarding requirement as follows:</p> <p>Completion of 6 semester hours in keyboarding. <u>Three of the hours must be from formal keyboarding instruction (or documented demonstrated mastery of the touch keyboarding skill), and three hours must include document formatting skills/word processing/computer applications).</u></p>
Repealed	430	Repealed	<p>The following underlined language is proposed to be added to the descriptor for the algebra requirement: Algebra --Experience shall include linear <u>(matrices, vectors, and linear transformations)</u> and abstract algebra <u>(ring, group, and field theory)</u>. [A college or university may integrate the competencies within specified coursework and document the completion of these competencies];</p>
Repealed	440	Repealed	<p>Probability and statistics are required for the Algebra I endorsement.</p>
Repealed	490	Repealed	<p>Environmental science is proposed to be added as a major so that individuals with a major in environmental science can complete at least one course in each of the following: geology, oceanography, meteorology, and astronomy and meet the endorsement requirements.</p>
Repealed	510	Repealed	<p>The following underlined language is proposed to further describe the requirements: <u>foundations and legal aspects of special education, assessment techniques for young children with disabling and at-risk condition</u></p>
Repealed	530 and 540	Repealed	<p>The endorsements of special education-specific learning disabilities, special education-mental retardation, special education-emotional disturbances, and special education-severe disabilities are proposed to be eliminated. Endorsements in special education-adapted curriculum and special education-general curriculum are proposed to be established.</p>
Repealed	570	Repealed	<p>The descriptor for the requirement of “theatre history” is proposed to be changed to “cultural context and theatre history.”</p>

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
Repealed	580	Repealed	<p>The name of the endorsement is proposed to be changed from Art prek-12 to Visual arts prek-12. The requirement of the “History of art, aesthetics, and criticism” is proposed to be changed to “Cultural context and art history, judgment and criticism, and aesthetics.”</p>
Repealed	590	Repealed	<p>Two levels are proposed for the administration and supervision prek-12 endorsement. Level I is required to serve as a building-level administrator or central office supervisor, and Level II is an optional endorsement to which an experienced building-level administrator may aspire.</p> <p>Four options are proposed to become eligible for the administration and supervision endorsement:</p> <ol style="list-style-type: none"> 1. An approved program route to Level I administration and supervision prek-12 endorsement; 2. An alternate route to Level I administration and supervision prek-12 endorsement that would be restricted to the recommending Virginia school division; 3. An alternate route to Level I administration and supervision prek-12; and 4. A route by holding an out-of-state administration and supervision endorsement. <p>Three years of successful, full-time experience in a public school or accredited nonpublic school in an instructional personnel position that requires licensure in Virginia is required for options 1, 2, and 3 above. The school leaders licensure assessment is also required for these three options.</p> <p>Coursework for an alternate route to administration and supervision must be taken from a regionally accredited college or university with a state-approved program in administration and supervision.</p> <p>A building-level administrator, with the recommendation of an employing Virginia school division superintendent, may seek Level II endorsement in administration and supervision preK-12 after successfully serving as a building-level administrator for at least five years in an accredited school and successfully completing a formal induction program as a principal or assistant principal. In order to earn Level II endorsement, the candidate must meet two or more of criteria listed in the regulations as specified by the Board of Education.</p>
Repealed	610	Repealed	<p>The mathematics specialist is proposed as a new endorsement.</p>

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
Repealed	640	Repealed	The school manager license is proposed as a new license.
Repealed	660	Repealed	No revisions are proposed for the school social worker endorsement. Please note that the visiting teacher endorsement is proposed to be discontinued.
Repealed	670	Repealed	The endorsement requirements are proposed to be located under the pupil personnel services area of the regulations.
Repealed	690	Repealed	<p>The following information has been proposed as a technical amendment to the regulations as a reason for revocation: Knowingly and willfully with the intent to compromise the outcome of an athletic competition procures, sells, or administers anabolic steroids or causes such drugs to be procured, sold, or administered to a student who is a member of a school athletic team, or fails to report the use of such drugs by a student to the school principal and division superintendent as required by Section 22.1-279.3:1 of the Code of Virginia. Any person whose administrative or teaching license is suspended or revoked by the Board pursuant to this section shall be ineligible for three school years for employment in the public schools of the Commonwealth;</p> <p>Additional changes were made to clarify and comply with statutory requirements.</p>
Repealed	710	Repealed	<p>The following information has been proposed as a technical amendment to the regulations as a reason for suspension:</p> <p>Knowingly and willfully with the intent to compromise the outcome of an athletic competition procures, sells, or administers anabolic steroids or causes such drugs to be procured, sold, or administered to a student who is a member of a school athletic team, or fails to report the use of such drugs by a student to the school principal and division superintendent as required by Section 22.1-279.3:1 of the Code of Virginia. Any person whose administrative or teaching license is suspended or revoked by the Board pursuant to this section shall be ineligible for three school years for employment in the public schools of the Commonwealth;</p> <p>Additional changes were made to clarify and comply with statutory requirements.</p>
Repealed	720	Repealed	<p>The following underlined language is proposed to be added: Revocation, suspension, or invalidation of the license by another state or territory;</p> <p>Additional changes were made to clarify and comply with statutory requirements.</p>
Repealed	730	Repealed	Additional changes were made to clarify and comply with statutory requirements.
Repealed	740	Repealed	<p>The following underlined language is proposed to be added:</p> <p>The State Superintendent of Public Instruction is authorized to approve the issuance of licenses for individuals who have misdemeanor convictions related</p>

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
			to drugs based on a review of the cases. No individual would be denied a license without a hearing of the Board of Education. Additional changes were made to clarify and comply with statutory requirements.
Repealed	750	Repealed	Additional changes were made to clarify and comply with statutory requirements.
Repealed	760	Repealed	Additional changes were made to clarify and comply with statutory requirements.

Enter any other statement here

Regulatory flexibility analysis

Please describe the agency’s analysis of alternative regulatory methods, consistent with health, safety, environmental, and economic welfare, that will accomplish the objectives of applicable law while minimizing the adverse impact on small business. Alternative regulatory methods include, at a minimum: 1) the establishment of less stringent compliance or reporting requirements; 2) the establishment of less stringent schedules or deadlines for compliance or reporting requirements; 3) the consolidation or simplification of compliance or reporting requirements; 4) the establishment of performance standards for small businesses to replace design or operational standards required in the proposed regulation; and 5) the exemption of small businesses from all or any part of the requirements contained in the proposed regulation.

The Department of Education has determined that there are no other regulatory methods. The Code of Virginia requires these regulations.

Family impact

Please assess the impact of the proposed regulatory action on the institution of the family and family stability including to what extent the regulatory action will: 1) strengthen or erode the authority and rights of parents in the education, nurturing, and supervision of their children; 2) encourage or discourage economic self-sufficiency, self-pride, and the assumption of responsibility for oneself, one’s spouse, and one’s children and/or elderly parents; 3) strengthen or erode the marital commitment; and 4) increase or decrease disposable family income.

The change in the licensure regulations will have no impact on the institution of the family and family stability.

(A summary of public comment begins on the following page.)

***Summary of Comments on the Proposed Regulations Governing the Licensure of School Personnel
(8 VAC 20-22-10 et seq.)***

Comments Related to Administration and Supervision Proposals

Date	Name	Title & Organization	Comments on Administration and Supervision
5/5/2005	Jane McDonald	President, Virginia Professors of Education Leadership	<p>Met (Tom Jackson) at the Women Education Leaders in Virginia Conference. Your message was clear:</p> <ul style="list-style-type: none"> -care about kids-all kids--- regardless of their backgrounds, current circumstances, and the financial status of their families; - help school districts raise student achievement (knowledgeable and competent teachers and leaders are the main parts of that quest); -Make policy decisions for the schooling of Virginia's youth that are based on content and substance, not politics. <p>In order to meet these intentions and to achieve the assurance of the families of school aged children and the general tax paying public we believe a new school administrator will be or have:</p> <ul style="list-style-type: none"> -successful competence in previous work endeavors -ability to supervise teachers and other school administrators effectively -ability to give credible suggestions about instructional methods that will improve student achievement -knowledgeable of federal laws of education, including the rights of teachers, students and parents -understanding how children learn and how to meet the complex needs of all students, including Special Education students, those who speak a different language in their home, and those students who come from a financially disadvantaged background. -He or she will have knowledge of financial management. <p>The following are suggestions for strengthening the accountability and quality of the proposed alternative route:</p> <ul style="list-style-type: none"> -All alternative-route individuals enter school administration through the School Managers License provision. -Divide the School Managers License into 2 tracks, or tiers. Everyone enters on tier #1 and begins with non-instructional responsibilities. Requirements fore tier #1 remain the same as stated in the current proposal: bachelor's degree, 3 years of successful managerial experience, and successful experience in working with children and youth. After 1 to 3 successful years as a non-instructional manager, an individual would have the option to move to tier #2, instructional leadership. (This

Date	Name	Title & Organization	Comments on Administration and Supervision
			<p>transition time gives the individual an understanding of how the school works and how best to change it, if necessary.)</p> <p>-Requirements for tier #2 include those listed in the current proposal, plus some expanded ones: have a master's degree, pass the SLLA; have the recommendation of the superintendent; demonstrate knowledge and competence in the core responsibilities of the principalship (education law, finance, supervision, curriculum, instructional methods, learning). We hope these suggestions will be helpful and substantial.</p>
<p>5/3/2005</p> <p>5/3/2005</p>	<p>Jane McDonald</p> <p>Ray Griffin</p>	<p>President, Virginia Professors of Education Leadership</p> <p>President-elect, Virginia Professors of Education Leadership</p>	<p>Support and concern about the proposal regarding the alternative route to K-12 Administration and Supervision licensure in Virginia. This recommendation resulted from HJR 124 Commission to Review, Study, and Reform Educational Leadership. Specifically the Commission recommended that the Board of Education "review its regulations as may be necessary to incorporate an alternative licensure route for principals and assistant principals." An alternative route is an idea with promise; however, what concerns us is that the current proposal before the State Board of Education essential abdicates responsibility for oversight of the quality assurance of principals and assistant principals in our schools and moves the Commonwealth away from its aims of accountability and educational excellence.</p> <p>Licensure is a system, however, imperfect, that is designed to ensure a certain level of professional knowledge among those most directly responsible for the education of our children: teachers, principals, and superintendents. The proposal currently being considered would allow superintendents to grant administrative licensure to anyone on the basis of two minimal criteria: (1) the individual holds a Masters degree in any field and (2) the individual has passed the SLLA. If the proposal is approved the individual is granted a renewable "Post-Graduate Professional License" by the Commonwealth of Virginia. This proposal provides incomplete measures of quality.</p> <p>This proposal subverts any objective standards that would require that a person have the appropriate knowledge, skills, and professional dispositions to lead the educational program of a school. There is little assurance that an alternately licensed school leader would have knowledge neither of how to lead and improve a school's instructional program nor of the state and federal laws that guide how schools function. It offers too few constraints for superintendents who may feel obligated to grant a license for reasons that go beyond securing the best available leadership for the students in his or her</p>

Date	Name	Title & Organization	Comments on Administration and Supervision
			<p>division, such as to family members, business partners, or to return a favor. Changes would relieve pressure from superintendents to hire unqualified school principals. Also, the proposal would allow those who enter the profession through this route to seek employment in any school division in Virginia, even if they were unsuccessful because they hold a renewable license. There are also additional concerns we have with the said proposal.</p> <ol style="list-style-type: none"> 1. According to Virginia Code §22.1-293, “A principal shall provide instructional leadership in, shall be responsible for the administration of and shall supervise the operation...” The current proposal provides no assurance- with the exception of the SLLA- that the candidate for licensure has any knowledge or experience in the instruction of children or the supervision of the instructional program. 2. Also, according to Code §22.1-293, “A principal may submit recommendations to the division superintendent for the appointment, assignment and promotion, transfer and dismissal of all personnel assigned to his supervision...” Again with the exception of a sing standardized test, there is no assurance that alternative route principals and assistant principals would be able to perform this function. The proposal will allow individuals with absolutely no instructional experience to supervise and direct professional, duly licensed teachers. 3. There is also no provision in the proposal that these alternative route principals will understand students with special education needs, students with limited English proficiency, and learners from financially disadvantaged families. 4. There is also no assurance that these alternative route principals were effective in their previous career because the recommending superintendent is not required to give his assurance of effectiveness in that person’s previous career. 5. If an alternately licensed principal is ineffective in one area of Virginia, what prevents him or her from moving to another area in Virginia, license in hand. <p>With these things in mind this is our current proposal to</p>

Date	Name	Title & Organization	Comments on Administration and Supervision
			<p>open positions of school leadership to non-educators. This should be seen as a pathway to retrieving an endorsement in Administration and Supervision.</p> <p>1. <i>Entry Requirements</i> The current proposal requires a bachelor’s degree, three years successful managerial experience, and successful experience in working with children or youth. We concur with the requirement of successful experiences in working with children and youth and in managerial positions, as we do not want to open the leadership of our schools as an employment option for those who have failed elsewhere. We recommend that individuals who want to transition into positions of school leadership through this route be required to hold a master’s degree demonstrating, in part, the individual’s cognitive and academic abilities.</p> <p>2. <i>Intended job functions</i> We agree with support the current proposal that bars the school manager from oversight of the instructional program. The current proposal reads, “The school manager endorsement is intended to provide for the differentiation of administrative responsibilities in a school setting. A school manager is endorsed to administration responsibilities in an educational setting. (For example, a school manager is restricted from evaluating teachers, supervising instruction, developing and evaluating curriculum, and serving as a schools student disciplinarian.)”</p> <p>3. <i>Transition to Administration and Supervision Endorsement</i> Using the proposed School Managers license as a means to attract successful leaders from other fields and to develop the competencies of effective instructional leadership is the aim of our revised proposal. After a designated period of time serving successfully as a licensed School Manager, an individual in this role could transition to earning a full endorsement in Administration and Supervision, responsibly opening the door to the key instructional leadership positions of the principalship or assistant principalship. Here’s how this could occur:</p> <ul style="list-style-type: none"> a. Designated period of successful service as a School Manager (2-3 years) b. Demonstrated competence in core responsibilities of the principalship that includes school law, finance, human resource management, supervision, curriculum, and instruction. These competencies could be demonstrated through a variety of means, such as recent course work, past training (e.g., an individual with a law degree would clearly have expertise in law already,) and/or previous job

Date	Name	Title & Organization	Comments on Administration and Supervision
			<p>responsibilities (e.g. previous human resource management experience). Also, some experiences as a school manager would help the individual better understand schooling and the person would have more credibility when attempting to change the conditions.</p> <p>c. Demonstrated professional competencies of school leadership through successful completion of the SLLA, in addition to other requirements.</p> <p>d. Recommendation of the employing Superintendent.</p> <p>These suggestions are not to be seen as an absolute assurance of quality, but VPEL believes these suggestions strengthen and legitimize the current School Managers proposal. Please know that VPEL stands with the State Board, the Department of Education, and Virginia’s school divisions to meet the need of attracting, developing and retaining the best leaders for our schools. Please consider these recommendations strongly.</p>
<p>9/19/2005</p> <p>9/19/2005</p>	<p>Jane McDonald</p> <p>Ray Griffin</p>	<p>President, Virginia Professors of Education Leadership</p> <p>President-elect, Virginia Professors of Education Leadership</p>	<p>VPEL Position Statement</p> <p>8VAC20-22-590 Administration and Supervision PreK-12 (position according to this section)</p> <p>The Virginia Department of Educations exploration of promising strategies to strengthen further Virginia’s K-12 schools by attending to the critical role of educational leaders is to be commended. In particular, we support the Departments proposed changes in standards for approved programs and we support, in principle, the proposed endorsement for “school managers,” if designed to be an alternate route of entry into the profession for non-educators. Similarly, we also support, in principle the VDOE’s proposed alternate route to school leadership. As we have made clear in several venues during the past year, we, as a professional association intent on ensuring the integrity of the preparation, licensure, and practice of school leaders, see the potential value in attracting and developing effective leaders from other fields to lead our schools. However, we remain greatly concerned that the current proposal for an alternate route to school leadership has the effect of eliminating any means of quality assurance to the public, policymakers, and professional teachers and, therefore, threatens the quality of teaching and learning.</p> <p>Our most particular concern about the proposed alternate route to school leadership has been clearly articulated by the Southern Regional Education Board (SREB). We must note that the VDOE relied on SREB’s policy analysis and recommendations in developing the</p>

Date	Name	Title & Organization	Comments on Administration and Supervision
			<p>proposed alternate route; therefore, we note that our position is in concert with that of the professional organization upon which the VDOE has relied in creating this proposal. Specifically the SREB recommends an alternate route to partnership IF a person has been successful in his or her previous leadership experiences. The current licensure proposal requires absolutely no accountability of recommending superintendents with regard to the experiential background, much less the quality of past performance of a candidate for the alternate licensure for school leadership.</p> <p>We recommend that the proposed regulations be changed to require a candidate for licensure to meet five criteria before being granted a professional license as a school leader from the State of Virginia through the alternate route:</p> <ol style="list-style-type: none"> 1. A master’s degree from a regionally accredited university. 2. Successful completion of the SLLA. 3. Successful completion of professional preparation or coursework in the areas of school law, instructional supervision, special education, school finance, and instructional leadership. 4. Successful completion and/or meeting of the Child Abuse Recognition and Intervention training and the Technology Competencies, both of which are specifically required of classroom teachers by Virginia’s licensure regulations. 5. Written attestation from the recommending superintendent that the candidate for licensure has had: <ol style="list-style-type: none"> a. A minimum of five years of high performance in a leadership role in a previous position or career. b. Relevant experiences pertaining to leading, managing, or conducting instructional or training programs, whether with children or with adults. <p>The fifth requirement is not a full-proof measure of accountability, but it is akin to the statement that every college and university based licensure officer of the states 16 approved programs must sign when they recommend a candidate for licensure. Thus, the requirement for superintendents to provide a similar statement for a candidate who is seeking licensure through the alternate route is neither onerous nor inappropriate.</p> <p>Finally, we recommend that the hiring school division must provide a supervised internship, parallel to that required of a candidate entering the profession through</p>

Date	Name	Title & Organization	Comments on Administration and Supervision
			the approved program route. This person is a trained mentor. The candidate would work for the first year on a local license and would not receive a permanent license until the successful completion of the internship.
7/14/2005	David W. Blevins	President, Virginia Association of Secondary School Principals	<p>I would like to share the concerns of middle and high school principals and assistant principals about anticipated proposals for alternative licensure for principals and assistant principals. Similar concerns were sent by VPEL (above statement)</p> <p>We are concerned with this because HJR 123 requested that the board of education “review its regulations as may be necessary to incorporate...” HJR 123 also noted the importance of a candidate having strong instructional performance in criteria and suggested that the Board review “alternate sources of training”. By funding 10 grants at \$100,000 each to school divisions to work with universities, businesses and the Department of Education, it appears that the 2005 General Assembly took an important step in the area of alternate licensure, and it is the recommendation of the VASSP that the Board study what emerges from these grants before instituting a course of action that does not recognize the critical nature of the teaching requirement for potential school instructional leaders. I refer specifically to an anticipated recommendation that would base alternate administrative licensure on 1) the holding of a master’s degree and 2) passage of the SLLA. We believe strongly that eliminating the teaching requirement for someone who is responsible for the oversight and review of a school’s teaching staff, in addition to the ultimate success of students, represents unsound educational as well as business practice, and we would urge you to reject such a proposal.</p> <p>Regarding the possible proposal for a School Managers license, we would note that the General Assembly reviewed the issue of “ school operations and business managers” in its consideration, and ultimate defeat, of HB 1771 and concluded that schools currently are not prohibited from hiring managers in a number of areas of school operations to assist principals. It was also brought out in testimony that assistant principals currently handle a number of jobs related to school operations, and that full funding of Boards SQQ revision item included in its 2004 recommendations to ass more assistant principals in the SQQ was more critical at this time than adding a new license for a “school manager”. We would concur with this assessment and would ask that the Board continue to support full funding of all of the 2004 SQQ revision items.</p>
9/15/2005	Dr. Gail Pope	Associate Superintendent,	As educators and administrators we strongly urge you to keep the three year teaching requirement as part of the

Date	Name	Title & Organization	Comments on Administration and Supervision
9/15/2005	Dr. Perry Pope	Manassas Park City Schools Principal, Osbourn High School, Manassas City Schools	licensure requirement for administrators. There are many reasons why this requirement is significant to the success of a school administrator especially as it relates to teacher evaluation. A classroom observation requires background knowledge, coupled with experience, in the development and presentation of instruction. One may be able to learn the process and procedure for developing and delivering a lesson. However, it takes practice and experience to discern when learning is taking place. Research tells us that it takes five years for a teacher to master the art and science of teaching. How can someone who has never had the experience of doing this most vital job recognize excellence, much less evaluate it?
9/16/2005	B. Colleen Shuda	Principal, Luray Elementary	I do not agree with the new proposed licensure requirement that removes the requirement for teaching experience for principals.
9/19/2005	Princess Moss	President, Virginia Education Association	<p>I want to that you and the Board for favorable action to reinstate that a candidate for principal or assistant principal has 3 years teaching experience. In the Report on the 2001 Virginia Principals Study conducted by The College of William and Mary, a substantial majority of principals identified their experience as a teacher and their experience as an assistant principal as most valuable. Our colleagues in the VASSP validate those findings.</p> <p>The VEA urges the Board of Education to also include teaching experience as a requirement for those candidates seeking an alternate endorsement. VEA believes that all principals, regardless of method of entry into that critical leadership position, need the same level of teaching experience to evaluate personnel and critical data while leading by example.</p> <p>The VEA is supported by conclusions reached by the <i>Commission to Review, Study and Reform Educational Leadership</i>. House Document 14 states that, "Modifying Board regulations to allow teaching experience..." (page 30, footnote 89 of HD 14, 2003)</p> <p>We believe that the Board's thorough review and thoughtful consideration of all aspects of licensure are essential to student success, and we appreciate your willingness to solicit the view of all parties involved in making our schools successful.</p>
9/16/2005 9/16/2005	Dr. William F. Flora Dr. Elizabeth Dore	Executive Director, Virginia Middle School Association President, Virginia Middle	<p>Virginia Middle School Association.</p> <p>As an association we strongly support the Board's recent decision to reinstate the teaching requirement for instructional leaders and potential instructional leaders seeking Level I endorsement and agree teaching experience is essential to a school leader's credibility and effectiveness as well as the ability to evaluate and assess</p>

Date	Name	Title & Organization	Comments on Administration and Supervision
		School Association	<p>staff and successfully manage student’s educational progress. However, we are strongly opposed to the decision to remove the teaching requirement for a candidate seeking the same endorsement through an alternative route. Having different standards for the same position with the same job responsibilities sends mixed signals to educators as well as the public, and we would respectfully request this decision be reviewed and reversed.</p> <p>We also feel the teaching requirement should be integral in leadership licensing regardless of the route to endorsement. School level administrators who have not been in a classroom do not have the experiential base to discern complex leadership decisions impacting children, staff, parents, and community.</p> <p>. Comments from administrators: “I have read everyone’s spin...What disturbs me is that in the interim student success and sometimes teachers’ careers are negatively impacted by the mistakes made by the administrator. I like to see administrators come through the rank and be successful teachers.”</p> <p>“My perspective is as a parent and as an experienced manager/leader...having principals without modest (I consider 3 years as modest) teaching experience would lead to more “business” focus in our schools and less attention on learning.”</p> <p>“I can see some positives to having good business leaders as principals. I think that in our concern to find able bodies to fill school administrator positions in the future that we ought not rush to lower “critical” requirements. That being said however, as a parent, I fear having principals without modest (I consider 3 years modest) teaching experience would lead to more “Business” focus in our schools and less attention on “learning.””</p> <p>“I agree with the others regarding my support of requiring an individual to have at least 3 years of classroom experience prior to becoming highly qualified as a principal...I grant the shortage of administrators may bring significant changes with licensure, but I think the school and classroom experience affords a prospective administrative candidates need that can only be obtained through this experience.”</p> <p>“I strongly believe that an effective administrator must spend a minimum of three years in the classroom before assuming a leadership role.”</p> <p>“As a central office administrator, I would not want to hire a principal who was not a teacher and in my current position it has been a rare moment to see a successful division leader who did not serve as a teacher and school</p>

Date	Name	Title & Organization	Comments on Administration and Supervision
			<p>leader...I am very against a reduction in the requirements for prior teaching experience.”</p> <p>Please keep Virginia as a national leader in education. We feel the choice to allow those with no prior teaching experience, and possibly no prior education experience, to achieve endorsement as a school administrator to be a choice which would result in systemic problems. These problems would not be undone for years, during which time the youth of the Commonwealth will suffer.</p>
9/16/2005	Bill Oehrlein	Principal, Hayfield Secondary, Fairfax County Public School	I believe very strongly that classroom teaching experience is crucial to the success of principals and assistant principals as they lead their schools to success. Principals must be able to relate to the experiences of classroom teachers and communicate as the school’s instructional leader.
9/16/2005	Peter J. Noonan	Principal, Centreville High School	I believe very strongly that classroom teaching experience is crucial to the success of principals as they lead their schools to success. Principals must be able to relate to the experiences of classroom teachers.
9/16/2005	Jennifer Beach	Fairfax County Public Schools	I urge the board to continue to require that school principals have classroom experience. We are all here to serve the kids, and only by actually can a leader understand what that truly means.
9/15/2005	Dr. Matthew Eberhardt	Assistant Superintendent, Instruction, Clarke County Public Schools	Without hesitation and most adamantly, we oppose such an action to remove the teaching requirement for a principal licensure. I represent Superintendent of Clarke County Public Schools, Sr. Smalley. Also, all 6 principals in the district oppose this action as well.
9/15/2005	Lisa Reinshuttle	Student Learning and Professional Development, Prince William County	I understand that the State Board of Education is seriously considering removing the three year teacher licensure requirement for future school administrators. I would urge you to please oppose this proposition.
9/15/2005	Theresa A. Tempesta	Teacher, Massaponax High School, Spotsylvania County Public Schools	Strongly oppose teaching requirement being dropped from administrator license. Those who have not been teachers cannot relate to classroom teachers. Please persuade the state to reevaluate this proposed plan of action.
9/16/2005	Ellen McCarthy	Assistant Principal, Mountain View Alternative High School	I firmly believe that teaching experience should remain a prerequisite for licensure as a school administrator. The classroom is a unique environment requiring a careful balance content knowledge, child psychology, learning theory and motivational skills...An educator, by definition, should have experience at educating. The word “principal” itself derives from the term “principal teacher,” accorded to the teacher who was responsible for securing materials, organizing classrooms and mentoring new teachers. I urge you to continue the current requirement of 3 years of teaching experience for licensure as a principal.

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9/15/2005	Robert Palermo	Assistant Principal, Thomas Jefferson Elementary	I would like to express my opinion about the possible change that would allow principal licensure without teaching experience. I have relied most heavily on my 24 years of classroom experience to help establish high standards in a supportive environment in my three years as an assistant principal...I see the role of the principal as the primary educator or lead teacher in the building, and experience in the classroom is essential in that role.
9/15/2005	John Smith	Assistant Superintendent for Personnel and Administration, Page County Public Schools	I was shocked to hear that the State Board of Education is strongly considering removing the three year licensure requirement for school administrators...I am very discouraged that a decision of this magnitude would not be shared with educators across the state...It is hard for me to believe that the State Board of Education would consider such a move if they were truly interested in the education of our students.
9/15/2005	Joyce Jenkins-Wimmer	Director of Instruction, Warren County Public Schools	I would like to express my deep concern that there is a consideration of removing the 3 year teaching experience as a requirement for principal licensure. We desperately need school principals to be instructional leaders in they building they serve...Instructional leadership, leading learning, is very different from Supervisory/Managerial Leadership, leading adults and programs...I am strongly opposed to removal of the 3 year experience as a requirement for principal licensure.
9/16/2005	Catherine H. Marston	Principal, Stanley Elementary, Page County Public Schools	I have a very strong feeling about the new regulations for principals. I believe to be a good administrator you must have teaching experience.
9/16/2005	David G. Smith	Principal, West Springfield High School	I believe very strongly that classroom teaching experience is crucial to the success of principals as they lead their schools to success. Principals must be able to relate to the experiences of testing and No Child Left Behind. I strongly urge the State Board to carefully consider this decision and seek input from Virginia Principals before proceeding.
9/19/2005	John B. Shinberger	Educator	Teaching experience should be required. Hands on experience is a very valuable commodity and unless you have "paid" the price you never really have a clue as to how things need to be handled...Please, please reconsider and at the very least make these "new" principals go through the ropes as a teacher first, assistant principal and then have to gain a principals position through their merit and educational experience...I implore your support in defeating this proposal or at the very least amending it so it is a fair playing field.
9/19/2005	Carol E. Johnson	Assistant Principal	I am writing to urge you to require principals to have at least 3 years of teaching experience before seeking endorsement as a principal...There are many facets of education that are best learned through experience vs. books. Please ensure that this experience remains a requirement of the principal licensure requirement.

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9/17/2005	Brenda Bushey	Principal, Shenandoah Elementary School, Shenandoah County Public Schools	I am dismayed to hear about the proposal to change licensure for principals in Virginia...A principal's job is unique. It requires that a person be able to manage building and budget and personnel, as in any other business, but it also requires that a principal be able to advise and direct teachers in instructional issues and to love and understand students and how they learn...Principals who have no successful classroom experience would simply not be able to do that very important part of the job effectively, nor would they be able to garner the respect of their staffs...I respectfully ask that the Board reconsider this proposed change.
9/16/2005	Roberto A. Pamas	Principal, Fairfax County	I believe very strongly that classroom teaching experience is crucial to the success of principals and assistant principals as they lead their schools to success. As the school's instructional leader, principals must be able to relate to the experiences effectively and timely. Instructional leadership is especially true, important and needed in this time of high stakes testing and No Child Left Behind...I strongly urge the State Board to carefully consider this decision and seek input from Virginia Principals before proceeding.
9/16/2005	Raye M. Tupper	Executive Director of Human Resources and Instruction, Rappahannock County Public Schools	Principals, now more than ever, must be prepared to provide effective instructional leadership...An excellent principal is able to both manage and lead. Teachers deserve and need building administrators who have the background and skills necessary to help them navigate through the high expectations set forth by NCLB and state accreditation standards...A three-year requirement is already bare minimum.
9/15/2005	India M. Harris	School Administrator	Opposes the proposal to administrators not required to have teaching experience. This decision would undermine the teaching profession and it would send a clear message to teachers that the profession is not respected or valued by our state...expecting teachers to be directly supervised and evaluated by people who have never set foot in a classroom is ludicrous...Instructional leadership is what our schools need at present, not "management" by persons with no classroom experience... This decision would greatly harm the morale of teachers (which is already a problem) and it would undermine the authority of the administrator in question...To expect teachers to respect and defer to the knowledge of persons with no classroom experience would set both the teachers and the administrator up for major problems. If people from outside of the field of education wish to become school administrators, we welcome them, but they need to experience life in the classroom first. It is an intrinsic part of effective school leadership.
9/15/2005	Ann Etchison	Executive Director,	The VASCD Board encourages the State Board to include teaching experience as a requirement for those

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		Virginia Association for Supervision and Curriculum Development	<p>candidates seeking an alternative endorsement as well...we feel strongly that to be an effective school administrator, building leaders must experience the rigor and reality of classroom teaching first hand...We believe that aspiring school administrators must possess knowledge and skills about instruction gained through teaching experience to be effective instructional leaders and to provide useful feedback that enhances both teacher performance and student achievement...</p> <p>While we support the Board's efforts to create flexibility in some area that will promote alternative ways to licensure and address the impending dearth of school administrators, we urge you to consider teaching experience as a critical component of any endorsement program for building administrators.</p>
12/4/2006	Barbara Warren Jones	President – Tidewater Association of School Personnel Administrators – Region II	<p>On behalf of the Region II Tidewater Association of School Personnel (TASPA) membership, we present the following comments and concerns highlighting the prospective changes to licensure specifications and the serious impact that they will have on Virginia's Region II school divisions if implemented.</p> <p>We support the Alternate Route to Administrative Licensure. This could be utilized in the event of critical shortage or unique need.</p>
11/9/2006	Megan Tschannen-Moran Theodore Creighton Ann J. Vinson Dr. Whitney Sherman Charles Hinsch Nate Leach	The College of William and Mary School of Education Professor and Program Leader Educational Leadership and Policy Studies Virginia Tech Assistant Professor Department of Educational Leadership and Counseling Old Dominion University Instructional	<p>I write to protest the proposed modification to 8 VAC 20-22-590 Section B (p. 53) that would grant a full, portable professional license in school administration and supervision to anyone who is recommended by a superintendent, holds a masters degree of any kind, and passes both the SLLA and two courses in school leadership.</p> <p>I urge the Virginia Board of Education to revise the proposed Licensure Regulations to ensure greater knowledge and competencies of people who are granted such an important professional license.</p> <p>Please change the proposed modification to additionally require:</p> <ol style="list-style-type: none"> 1. Demonstration of proficiency in special education, school finance, and instructional leadership, as well as successful completion and/or meeting of the Child Abuse Recognition and Intervention training and the Technology Competencies required of classroom teachers. 2. Written attestation from the recommending superintendent that the candidate for licensure has had: <ol style="list-style-type: none"> a. A minimum of five years of high performance in a leadership role in a

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	Travis Burns	Technology Teacher Specialist – Granby Elementary and Tidewater Park Elementary	<p>previous position or career.</p> <p>b. Relevant experiences pertaining to leading, managing, or conducting instructional or training programs, whether with children or with adults.</p> <p>3. That the hiring school division must provide a supervised internship, parallel to that required of a candidate entering the profession through the approved program route. The candidate must have a trained mentor. The candidate would work for the first year on a local license and would not receive a permanent license until successful completion of the internship.</p> <p>If these provisions are not met, candidates recommended by superintendents to assist with situations of extreme shortage should be granted only local, provisional licenses, in keeping with current practice.</p>
	Dr. Linda Hutchinson	Special Education Teacher/Asst.	
	Laura K. Jones	Football Coach York High School	
	Penny Brooks	Assistant Principal – GHS	
	Farrah N. Hargrove	Teacher Quality Resource, LLC	
	Dr. David W. Gaston	Assistant Principal Westside Elementary School Isle of Wight Public Schools	
	Heather Long	Special Education Teacher Greenbrier Intermediate Chesapeake Public Schools	
	Rev. David M. Hindman, D. Min., M.A., Ed.D.	Principal James River Elementary School Williamsburg-James City County Public Schools	
	Theresa Krause		
	Dr. Pamela Tucker		
	Dr. William Owings		

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	Lisa A. Tilley	<p>United Methodist Campus Minister The Wesley Foundation at the College of William and Mary</p> <p>English Instructional Supervisor Newport News Public Schools Associate Professor Curry School of Education University of Virginia</p> <p>Professor Graduate Program Director for Education Leadership Old Dominion University</p>	
11/17/2006	Beth Knight Brown	Director of CTE/Gifted Education Middlesex County Public Schools	<p>I was alerted this morning in a recent email to the following statement and would like to provide you with an appropriate response.</p> <p><i>The Virginia Board of Education proposes to grant any person with a Masters degree in any subject a permanent, renewable, and portable professional license in school administration and supervision upon the recommendation of a superintendent and as little as two courses in leadership preparation and the passage of a simple test. These persons would not have to hold a teaching license or have any experience in a K-12 setting, and yet they would be charged with the oversight of the instructional program of a school and the supervision of teachers and other school personnel.</i></p> <p>I feel that principals need to be endorsed and come onboard with full leadership credentials. Virginia needs uniform training in administration and leadership with an emphasis on CURRICULUM. I am worried that the italicized statement above could result in ATHELETIC COACHES AS PRINCIPALS as an evolutionary</p>

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			<p>outcome statewide in many of our high schools. High schools could fast become less rigorous academically, but indeed more athletic! With data driven decision making and high stakes testing being the norm today, we need an experienced educated leader in every school who has passed a challenging variety of essential educational courses, attained a high score on a national exam based on ISSLC standards, completed a supervised internship <i>and earned</i> an endorsement as a principal.</p> <p>What we need to consider is how to get good teachers to become administrators by offering excellent programming which will prepare them for the leadership requirements of tomorrow. There are some higher education programs out there that do a great job at this. Virginia Commonwealth University has one of the best. I feel that every ounce of my education at VCU in the post master's certificate program in Educational Leadership has prepared me to be an administrator in a very efficient way. But I had to search long and hard to find a program that would fit a busy teacher's schedule and pocketbook.</p> <p>The courses I took through VCU were a perfect component to prepare me to do an excellent job in any administrative setting. They were taught by highly qualified faculty and professional administrators from neighboring school divisions as well. In this way, a blend of philosophy, theory, and <i>practice</i> were incorporated. The classes were not taught on the campus of VCU but at a satellite campus (high schools) in the suburbs, lowering the cost of tuition and decreasing the travel time for me. I traveled from my school in Newport News around two o'clock in the afternoon to Hanover for four o'clock classes and completed the twenty-one hour post-masters certificate program in less then two years. More people would be qualifying and taking classes if there were more programs like the one VCU offers. These low cost accessible programs can attract more teachers to become administrators.</p> <p>Please do not allow a lack of accessible program offerings in higher education and foreseeable shortage of administrators to equate to decreased requirements or alternative options for administrators to be. Your current licensure requirements are justifiable and realistic. The real issue here is figuring out how to attract future administrators to meet those expectations quickly. The solution I feel is to offer more off campus offerings at satellite campuses within school divisions to get people qualified! Encourage post-master certificate programs. Mandate school divisions to create leadership academies. I urge you to strongly reconsider taking any alternative options like the above proposal and put your effort into</p>

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			encouraging the existence of excellent, efficient, and economical professional development options like the one at VCU for educators who want to be administrators.
11/29/2006	Dr. Christopher R. Gareis	Assistant Professor of Educational Leadership The College of William and Mary	<p>I am writing to propose the amendment of the proposed modification to 8 VAC 20-22-590 Section B (p. 53) that would grant a full, portable professional license in school administration and supervision to anyone who is recommended by a superintendent, holds a masters degree of any kind, and passes both the SLLA and two courses in school leadership.</p> <p>With nearly two decades of service to K-12 schools in Virginia, as a classroom teacher, assistant principal, principal, central office administrator, and professor of educational leadership, I see the proposed licensure regulation as well intentioned, but inadequately designed. In short, the idea of creating an alternate route to school leadership is laudable, but my experiences with alternate routes of other sorts in the field of education tell me that poorly designed alternate routes that sacrifice substance for ease of entry into the field most often result in very bad educational experiences for children and very unhappy parents.</p> <p>I urge the Virginia Board of Education to revise the proposed Licensure Regulations to ensure greater knowledge and competencies of people who are granted such an important professional license.</p> <p>As an alternative to the proposed licensure regulation, I suggest the following requirements:</p> <ol style="list-style-type: none"> 1. Demonstration of proficiency in school law, special education, school finance, and instructional leadership, as well as successful completion and/or meeting of the Child Abuse Recognition and Intervention training and the Technology Competencies (both of which are required of classroom teachers in the Commonwealth). 2. Written attestation from the recommending superintendent that the candidate for licensure has had: <ol style="list-style-type: none"> a. A minimum of five years of high performance in a leadership role in a previous position or career. b. Relevant experiences pertaining to leading, managing, or conducting instructional or training programs, whether with children or with adults. (Some may argue that requiring this of superintendents is an imposition on them and calls into question their

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			<p>intent. On the other hand, it is vitally important to provide for some checks-and-balances when allowing for an alternate route to replace licensure regulations that require far, far more of accredited universities that currently serve to recommend candidates for licensure.)</p> <p>3. That the hiring school division must provide a supervised internship, parallel to that required of a candidate entering the profession through the approved program route. The candidate must have a trained mentor (just as the Commonwealth requires of every novice teacher in the state). The candidate would work for the first year on a local license and would not receive a permanent license until successful completion of the internship.</p> <p>If these provisions are not met, candidates recommended by superintendents to assist with situations of extreme shortage should be granted only local, provisional licenses, in keeping with current practice. To grant full professional licensure through minimal criteria is a short-sighted attempt at a solution to complex and long-term challenges that confront our schools, our state, and our society.</p> <p>Thank you for your consideration of my very earnest thoughts on this matter.</p>
11/30/2006	Dr. Christopher R. Gareis	Assistant Professor of Educational Leadership The College of William and Mary	<p>I write to urge the Virginia Board of Education to revise the proposed Approved Program Regulations before final approval. Specifically, I write to address 8 VAC 20-542-530 Administration and Supervision, section 3 (on page 116), which describes requirements for the administrative internship. While I commend the proposal to increase the rigor of the administrative internship, I foresee that the unintended consequence of the sharp increase required clock hours will (1) put an undue burden on qualified teachers seeking to become licensed, practicing school leaders and (2) inadvertently contribute to the shortage of qualified educational leaders. What is more, I raise these concerns because there is no research-based evidence that increasing internship hours will measurably improve the performance of school leaders or, ultimately, student learning.</p> <p>With this in mind, I suggest that 8 VAC 20-542-530 Administration and Supervision, section 3 be edited by striking the words "440 clock hours" so that section 3 would read "Complete a minimum of 320 hours of a deliberately structured and supervised internship..." Based on my own research on this topic,</p>

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			<p>participation in several VDOE committees that investigated the topic, and my own experience as a former school principal, who was trained in Virginia, I believe the rigorous but reasonable requirement of 320 hours sets a sufficiently high criterion of excellence, whereas the proposal to increase the required hours to 440 would create an undue burden on the very people we all want to attract to positions of school leadership, without any evidence that the increase in hours would result in any appreciable difference in quality of preparation.</p> <p>Thank you for your consideration of my thoughts.</p>
11/29/2006	Dr. Cheryl Magill	Department of Educational Leadership School of Education Virginia Commonwealth University	<p><u>Proposed language from 8 VAC 20-542-60: Regulations Governing the Review and Approval of Education Programs in Virginia</u></p> <p><i>PART IV: Standards for Board of Education Approved Accreditation Process</i> 8 VAC 20 -542-60.A.6C. (pages 9-10): “...Programs in administration and supervision...provide at least 440 clock hours of field experiences with a minimum of 320 clock hours as part of a deliberately structured internship over the duration of a preparation program.”</p> <p><i>PART VII: Competencies for Endorsement Areas</i> 8 VAC 20-542-530 (page 56): “3. Complete 440 clock hours with a minimum of 320 clock hours of a deliberately structured and supervised internship that provides exposure to multiple sites with diverse student populations...”</p> <p>COMMENTS: The Department of Educational Leadership supports the concept of having candidates participate in deliberately structured and supervised internship experiences in varied settings with diverse student populations throughout the preparation program. Regulations should maintain language that allows preparation programs to maintain the flexibility to align these experiences with the goals and objectives of courses throughout the program, as well as provide extended experiences of at least 120 hours in a formal culminating “internship” course, as is intimated in 8VAC 20-542-60A.6.C. Slight variations in proposed language regarding these internship experiences in the above two sections does not make this clear, and the language should be consistent in both</p> <p><u>Proposed language from 8 VAC 20-22-10: Licensure</u></p>

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			<p><u>Regulations for School Personnel</u></p> <p><i>PART VI: Licensure Regulations Governing Support Personnel</i> 8 VAC 20-22-590. Administration and supervision preK-12 (page 33):</p> <p>“B. Approved program route to Level I administration and supervision preK-12 endorsement. To become eligible for a Level I endorsement under this option, the candidate must have: ...</p> <p>4. Completed a minimum of 320 clock hours of a deliberately structured and supervised internship that provides exposure to multiple sites (elementary, middle, high, central office, agency) with diverse student populations. These experiences shall be an integral component of a Virginia Board of Education approved preparation program. The internship must be focused on learning for all students and must occur in a public school or accredited nonpublic school...”</p> <p>COMMENTS: Again, the Department of Educational Leadership supports the concept of having candidates participate in deliberately structured and supervised internship experiences in varied settings with diverse student populations throughout the preparation program. Language should be consistent among all sections regarding internship experiences.</p> <p>The requirement of 320 hours of internship in the proposed licensure regulations conflicts with 440 hours of internship required in the proposed approved program regulations. All sections of regulations addressing internship should require 320 hours, maintaining the requirement that these be built in throughout the program and maintaining the intent of the intimation in 8 VAC 20-542-60A.6C. that at least 120 hours will be in a “formal” culminating experience.</p> <p><i>PART VI: Licensure Regulations Governing Support Personnel</i> 8 VAC 20-22-590. Administration and supervision preK-12 (page 33):</p> <p>“C. Alternate route to Level I administration and supervision preK-12 endorsement.</p> <p><i>In order to be eligible for Level I endorsement under this option, the candidate must have:</i></p> <p>1. A master’s degree from a regionally accredited college or university;</p> <p>2. Completed graduate coursework addressing</p>

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			<p><i>competencies in school law, evaluation of instruction, and other areas of study as required by an employing Virginia school superintendent;</i></p> <p><i>3. Satisfied the requirements for the school leaders licensure assessment specified by the Board of Education; and</i></p> <p><i>4. Been recommended by a superintendent in an employing Virginia school division.”</i></p> <p>COMMENTS:</p> <p>Structured and lengthy internship experiences are addressed three times in the proposed regulations giving credence to the importance the Board places on such experiences. The Department of Educational Leadership believes that such importance should be reflected again here. A fifth requirement for alternate licensure should be an internship experience consistent with the internship experiences as they are finalized by the Board both in the program approval regulations and in the licensure regulations. Failure to add this requirement will allow administration/supervision candidates to circumvent the internship requirement entirely by seeking endorsement through this alternate route. It is clear from the proposed regulations noted earlier that the Board’s intent is to strengthen the internship experiences of candidates, and not to establish means by which the internship can be avoided.</p> <p>The Department of Educational Leadership believes that the Board understands the critical role school administrators and supervisors play in improving student achievement. Therefore, the alternate licensure regulations should require a master’s degree in an education-related field from a regionally accredited college or university.</p> <p>The Department of Educational Leadership understands that the Board wishes to provide school division superintendents the flexibility to find the best “match” between school administrators, supervisors, and the schools they will lead. A proposed alternate route to Level I administration and supervision would accomplish this. However, what one school division superintendent determines to be a good “match” may not meet the needs of another school division superintendent. Therefore, the Department of Educational Leadership believes that the alternate route administration/supervision endorsement should parallel the intent of the Board’s “local eligibility license” for teachers as described in 8 VAC 20-22-50 by being:</p> <ul style="list-style-type: none"> a three-year (maximum) non-renewable endorsement; non-transferable to other school divisions exempt from reciprocity with other states

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12/1/2006	Antoinette Brady	Librarian Westside Elementary School Isle of Wight Public Schools	<p>Coming from a family of educators and a father who was a superintendent for over 20 years, I can have grown up around educators of all educational levels. I have also worked for 4 local school systems in the Tidewater area, in the last 12 years, in positions ranging from tutor to HR administration. I have encountered many school administrators that were excellent to, in my opinion, awful, regardless of educational level. Because of my experiences in education, I am a firm believer that college classes and degrees are only a part of what makes an effective administrator.</p> <p>I understand the VA DOE's position to increase the number of applicants available for vacant school administrative positions. Given this current proposal, the final decision to hire is STILL up to the individual school system. It is up to the school system to create a mentor or monitoring program to oversee and guide these potential administrators on the right and EFFECTIVE path for students' success in school.</p> <p>Therefore, my personal opinion is that I do not oppose this proposal due to the fact that the final decision to hire is STILL up to the individual school system and superintendent.</p>
12/15/2006	Dr. David Parks		<p>Internship and Clinical Experiences</p> <p>I am in favor of holding the line on the proposed internship and clinical experience hours and requirements as specified in both the proposed certification and program approval regulations. An internship of 320 clock hours and embedded experiences in courses of 120 clock hours are minimal for preparing school leaders. Although the other requirements for clinical experiences do not go far enough, they are a step in the right direction.</p> <p>Principals and superintendents criticize preparation programs for not being sufficiently connected to the field. If the hours of experience in schools with an able mentor principal or supervisor are diminished, candidates preparing to be leaders will be left with more of the same kind of university classroom experiences that are described by superintendents and principals as outdated, too theoretical, and disconnected from the work of school leaders.</p> <p>I have heard the arguments for reducing the internship and clinical hours because of inconvenience to students and hardships that may be imposed on them due to work hours. Inconvenience and hardships are not good reasons to reduce the experiential requirements in preparation programs. I have been associated with a program that has an internship requirement of 720 clock hours over two years, and students have been able to</p>

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			<p>meet that requirement. The preparation of school leaders is too important to be based on the convenience of any group. The stakes for the education of children are much too high.</p> <p>Summaries of the criticisms of preparation programs from three recent studies follow. The summaries are taken from a paper (Parks, Creighton, & Awuor, 2006) that is being prepared on the preparation of school leaders, and they provide the data supporting my position.</p> <p>(Farkas, Johnson, Duffett, Foleno, & Foley, 2001)</p> <p>Responding superintendents and principals were not happy with preparation programs for school leaders. Eighty percent of the superintendents and 69% of the principals said that “typical leadership programs in graduate schools of education are out of touch with the realities of what it takes to run today’s school district”(Farkas et al., 2001, p. 35). The chief complaints were that the content of the programs was too theoretical and too oriented toward preparing researchers rather than practitioners.</p> <p>(Farkas, Johnson, Duffett, Syat, & Vine, 2003)</p> <p>Again in this survey, as in the 2001 survey, about 7 in 10 superintendents (72%) and principals (67%) said that the statement “typical leadership programs in graduate schools of education are out of touch with the realities of what it takes to run today’s school district” was close to their point of view (Farkas et al., 2003, p. 54) . Only 2% of the superintendents and 4% of the principals said that “graduate school studies” were the “most valuable” activities in getting them ready for their jobs. Although these statistics don’t place preparation programs in a very favorable light in the minds of superintendents and principals, all is not dim, for 69% of the superintendents and 74 % of the principals said that they found “some useful things” in their university preparation programs. There was no mention of what these “useful things” were.</p> <p>Nor did certification requirements fare well in the minds of superintendents and principals. Few superintendents (8%) and principals (21%) thought that certification “guarantees [that the] typical principal has what it takes” (Farkas et al., 2003, p. 40). Forty-five percent of the superintendents and 36% of the principals believed that certification “guarantees very little.” Both groups (74% of the superintendents and 78 % of the principals) said that the requirements for certification should be changed to include more practical experiences.</p>

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			<p>Because certification and preparation program requirements go hand-in-hand in most states, these data provide more evidence that preparation programs don't fare well in the minds of principals and superintendents.</p> <p>(Levine, 2005)</p> <p><i>Curriculum.</i> There is no clear basis for the curriculum in most programs; it is a mere "collection of courses" (Levine, 2005, p. 27). Students aren't held to high standards of performance in courses (44% of the principals said that "the school of education curriculum lacked rigor" (Levine, p. 30); the content is not focused on the needs of school leaders in today's environment (47% of the principals and 39% of the alumni from the educational leadership program said that "the school of education curriculum was outdated" (Levine, p. 30); and large proportions of alumni gave "fair to poor" ratings on the preparation of school leaders for working with local politics (50%), diversity—environmental (41%), socio-economic (41%), ethnic and racial (38%); bureaucracies and external stakeholders (35%); and accountability (31%). Thirty-seven percent of the principals said that "education schools do not adequately prepare their graduates academically" (Levine, p. 30). Both alumni and current students said that the curriculum was too theoretical and reported that they would prefer more field-relevant content delivered in an active learning environment.</p> <p>Clinical experience has become institutionalized in educational leadership programs. Nearly all programs include some form of clinical experience. In the 25 schools of education visited by Levine's team, 24 of them had either an internship or a practicum. Beyond having clinical experiences in the curriculum, Levine had little good to say about the quality of them. My interpretations of his conclusions are that the experience is--</p> <ul style="list-style-type: none"> • Too narrow, being confined to the candidate's home school. • Not adequately supported by carefully selected, trained, and supervised mentors. • Not adequately planned, being left to the mentoring principal to assign tasks related to state certification requirements. • Not taken seriously by candidates, mentors, or campus supervisors. • Not extensive enough in both time spent with the mentor and the intensity (now completed in small time blocks at convenient times for both mentor and intern) of the experience.

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			<ul style="list-style-type: none"> • Not integrated with the rest of the curriculum in the program. • Not supervised by professors who have experience in the field. <p>The above criticisms do not apply to all programs; however, they do apply to many.</p> <p>Alternative Licensure of Principals and Supervisors</p> <p>I am in favor of the proposal for alternative licensure of principals and supervisors.</p> <p>I fully realize that alternative licensure has the potential to compete with traditional preparation programs; however, I view this competition as healthy for traditional preparation programs, the public schools, and children. Criticisms of traditional programs have fallen on deaf ears for more than a generation of professors. Possibly, some competition from this alternative route and from alternative division-based programs will cause the new generation of faculty to take notice and make substantive changes in their programs. School divisions will have more options when hiring principals and supervisors. There may be good candidates for these positions outside the field of education (or within), and school superintendents should have the option of hiring them and being accountable for their performance. It is expected that special mentoring and training will be necessities for many if not all of these. In the end, I believe the children will be the beneficiaries. They will have the benefit of improved preparation programs and capable principals and supervisors who can guide their educational development.</p> <p style="text-align: center;">REFERENCES</p> <p>Farkas, S., Johnson, J., Duffett, A., Foleno, T., & Foley, P. (2001). <i>Trying to stay ahead of the game: Superintendents and principals talk about school leadership</i>. New York: Public Agenda.</p> <p>Farkas, S., Johnson, J., Duffett, A., Syat, B., & Vine, J. (2003). <i>Rolling up their sleeves: Superintendents and principals talk about what's needed to fix public schools</i>. New York: Public Agenda.</p> <p>Levine, A. (2005). <i>Educating school leaders</i>. Washington, DC: The Education Schools Project.</p> <p>Parks, D., Creighton, T., & Awuor, R. (2006). <i>Educational leadership: Voices from the field</i>. Unpublished manuscript, Blacksburg.</p>

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12/15/2006	Nancy L. Munden	Human Resources Licensure Analyst Hanover County Public Schools	Also, why weaken the Administration and Supervision endorsements. If non instructional school building personnel are necessary in a school division, let the school divisions handle it.
12/15/2006	Dr. David Parks	Professor, School of Education Virginia Tech	<p>Alternative Licensure (Recommended Change in Wording)</p> <p>One of the criticisms of programs is that they aren't relevant to the work of principals and supervisors; they focus too much on management of schools and too little on the core of learning, instruction, curriculum, and data-based leadership. Thus, I propose the following change in the alternative licensure regulations:</p> <p>2. Complete[d] graduate coursework addressing competencies in school law, evaluation of instruction, learning, instruction, curriculum, data-based leadership, and other areas of study as required by an employing Virginia school superintendent;</p> <p>My thinking is that superintendents would add in the school law and other areas of managerial study that they thought would help the new principal. To be successful, however, new principals must hit the ground with strong instructional knowledge and skills. This wording would keep in front of superintendents and candidates this important core of work.</p> <p>My second recommendation is in the proposed changes in the approved program regulations.</p> <p>Approved Program for Level I Certification of Principals and Supervisors (Add an Item to 8 VAC 20-542-530. Administration and supervision prek-12, Part 2.a.</p> <p>I recommend adding a 9th item as follows:</p> <p>a. Knowledge understanding, and application of planning, assessment, and instructional leadership that builds collective professional capacity, including;</p> <p>9. An understanding of laws, rules, and regulations governing special education and the ability to develop with teachers and specialists relevant IEPs and programs that prepare special needs students for independent, productive lives in a global society;</p>

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			I hear directors of special education speak about principals who know little about special education programs and procedures. Therefore, I urge you to add a statement like the one above or some other that highlights the importance of knowledge, skills, and dispositions in special education for principals and supervisors.
12/15/2006	Dale Sander Marceline R. Catlett Elaine A. Garner	Superintendent Assistant Superintendent for Instruction and Personnel Supervisor of Personnel Services Fredericksburg City Public Schools	We oppose the following proposed revision: 8 VAC20-22-590. <u>Level I and Level II Administration and Supervision PreK-12 endorsement.</u> We do not see the necessity for this differentiation and again this would put another work burden as well as another financial burden on the school divisions.
12/15/2006	Vince Indelicato		With regards to 8VAC20-22-590, while I do like the proposed change to allow levels of the endorsement, I believe a better designation similar to the proposed license designations in 8VAC20-22-60 should be considered. Such descriptions are much more informative to the public at large and to non-Virginia educational agencies than a simple Level I or Level II designation. In addition, I am not in favor of the alternate route for Level I endorsement denoted in 8VAC20-22-590.B. I am a firm believer that the best managers and administrators in any field are those that have “come out of the ranks”. To remove the requirement that a person seeking the Administration and Supervision endorsement have at least three years of full-time experience as a classroom teacher gives the possibility that schools could end up being led by “professional managers” and not “managing professionals”. The only change I would make to this requirement would be to change the classroom teacher component to one requiring three years of professional experience as a classroom teacher, guidance counselor, or library media specialist. These are all considered instructional positions and are all generally school level positions as opposed to school division level positions and successful experience in any of these three types of positions would, in my opinion, prepare a person for endorsement in Administration and Supervision.
12/4/2006	Phillip Hamilton	Delegate, Ninety-Third District Virginia House of Delegates Chairman Commission to	I was pleased to serve as the chairman of the General Assembly’s three-year Commission to Review, Study, and Reform Educational Leadership (HJR20/SJR58). The Commission’s final report made several recommendations to reinforce the fact that effect leadership is critical to continuing to improve student performance in our schools.

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		Review, Study and Reform Educational Leadership	<p>Many of these recommendations are incorporated in the proposed Regulations Governing the Licensure of School Personnel and Regulations Governing the Review and Approval of Education Programs in Virginia. Specifically addressed are the following:</p> <ul style="list-style-type: none"> • Alignment of the internship with “real life” experiences, by providing a “supervised, structured experience;” • Adjunct faculty are to be provided with appropriate resources to ensure quality preparation of school personnel; • Preparation programs will be more sternly evaluated, with separate accreditation and biennial approval being required; and • A two-tiered licensure system composed of required (Level I) and optional (Level II) components is provided. Part of the Level II endorsement is completion of a formal induction/mentoring program as a principal or assistant principal. <p>It is my belief that these and other provisions contained in the proposed regulations will enhance the quality of our school leaders for years to come, and I urge you to give them you final stamp of approval as soon as possible.</p>
12/7/2006	Dr. Glenn L. Koonce	Associate Professor Chair, Educational Leadership Program Regent University	<p>My topic: The Alternative Route to K-12 Administration and Supervision Licensure, specifically the principal and assistant principal, and the proposal to require a minimum of 440 internship hours for all candidates for licensure in an approved administration preparation program in Virginia. Let me state eight points to make it clear why I am here:</p> <ol style="list-style-type: none"> 1. I realize my position in your eyes as a professor. I chose to come to speak as a “recent” and long-term practitioner in the public school culture. I taught at all three levels, was an alternative school administrator, an elementary principal, junior high & middle school principal, high school principal, director and assistant superintendent. 2. I am NOT opposed to Alternative Licensure, but I am concerned about preparedness to be an effective, responsible, accountable, and “legally safe” school leader. 3. I very much favor internships in school leadership preparation programs and would love to see a full funded year-long internship for every school leader candidate, but I am concerned about the number of hours being recommended without any support for already high-achieving and hardworking teachers who

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			<p>cannot afford time-wise or instruction-wise to be away from their classes...of for financial impossibilities of taking “no-pay” time off from their teaching positions.</p> <ol style="list-style-type: none"> 4. Students - #1 always. Everything done, every decision made must be focused “first” on students. I know I am preaching to the choir on that one! But to do this takes effective leadership composed of “specific” professional knowledge, dispositions, and performance related to growth, development, and learning of every student. 5. TEACHERS – Without effective teachers in our lives...none of us would be in the positions of leadership represented here tonight. In my years as a principal, I “was” and “instructional leader”...tasked to establish, monitor, evaluate, and “restructure” what takes place in school classrooms once the teachers closed the door and instruction began. 6. There are two things that are “essential” in school leadership, no broad stroke leadership but very specific, new general leadership, First, is maintaining school safety (school children and your adults better go home in the afternoon the way they came to school that morning – SAFE)...and second, is improving student achievement for every single child and young adult. The other tasks in school leadership are merely important. There are 5 standards and 148 sample performance indicators for school leaders in the Virginia Department of Education’s Guidelines for Uniform Standards and Evaluation Criteria for Teachers, Administrators, and Superintendents. Principal preparation programs, traditional or through an alternative route, must spend a majority of preparation time on what is essential not only on what is important. No one can just “step in” and be effective in accountability for student safety and student achievement for every student. 7. Culture. “Uniquely”, school leaders are not in an enterprise where they control the raw product. School leaders take “all” children and young people, as the raw product and competently move them to specific outcomes. Engagement with the school culture, as the school’s leader, “is developed” not “hatched” overnight. 8. Parents can be a huge factor in collaboratively involved activities with school leaders. An effective school leader must have the “capacity” and the “experience” to forge productive

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			<p>working relationships with parents.</p> <p>I want to state that whatever alternative route for K-12 Administrative and Supervisors Licensure approved by this Board, please do not “fling wide open” the gates to the principal-ship without RIGOR! Rigor is defined as the application of precise and exacting standards.</p> <p>Having said that, I again emphasize that I am not against seeking non-traditional routes to school leadership – we should always be challenging ourselves to developing [sic] the very best program for preparing school leaders. I believe an EXCELLENT PROTECTOR for this new step (risk you might say) in the recommended regulation is that is be “NON-PORTABLE”. With rigor being challenged, it would be wise not to give a statewide license, that would also have reciprocal impact with other states, based on the simple criteria being recommended.</p> <p>Let me close with an analogy I can relate to. I’ve been there! I experienced the most challenging leadership position in human existence, as a combat platoon leader in Vietnam...where the “DATA WALL” consisted of MY MEN who lived and MY MEN who died. But I was trained very well through knowledge, dispositions, and performances through a very highly standards-based program delivered by the individuals who prepared me. There were not wide-open gates for me and I did not walk in combat, in the platoon leaders boots, prior to becoming a combat platoon leader myself, although I did a brief internship on the field of battle – but I was rigorously trained and prepared when the time came for my leadership.</p> <p>I cannot imagine my men accepting a highly successful Sears & Roebuck store manager who passed a battlefield preparation test and was recommended by the General to come into the “killing fields” to lead them.</p> <p>You say to me, leadership in Vietnam is not the same as leadership in a public school. Well, it is not if you look at the different cultures and the fact that the supreme sacrifice of life or horrible injuries are a real variable between the two. It does serve as a strong example (analogy-have you) when a leader is put into a position where he is unprepared for the task at hand.</p>

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			<p>Our principals, each and every day are in the heat of the battle for the safety and improved achievement of “ALL” students in their school, and in a way, find themselves working with the data board of “educational life and educational death” of each one of their students. We do not want to widely, throw open the gates to such a life changing leadership position in our schools – the front line principal – by allowing a path to the principal-ship [sic] that lacks effective school leadership preparation rigor, or free reign through the state or even our country.</p> <p>Always make the children number one in your deliberations.</p>
11/29/2006	Dr. William C. Boshier, Jr.	Executive Director Commonwealth Educational Policy Institute Virginia Commonwealth University	<p><u>Overview of State Action for Educational Leadership Project (SAELP)</u></p> <ul style="list-style-type: none"> • With SAELP planning grant funds, CEPT created a state consortium • Three summits on educational leadership – state policymakers, educators, and stakeholders – featured facilitated team discussions, and produced 85 recommendations for implementation strategies targeting leadership issues • The 2002 General Assembly created the HJR 20 (Hamilton)/SJR 58 (Hanger) Commission to Review, Study, and Reform Educational Leadership, to examine the policy environment for school leadership. • A Task Force to Evaluate and Redesign Preparation Programs and Professional Development for School Leaders, composed of educators and chaired by DeMary (DOE) and Palmiero (SCHEV), was created to closely examine policy/regulatory provisions. <p><u>SAELP’s Link to the Proposed Regulations</u></p> <ul style="list-style-type: none"> • The HJR 20/SJR58 Commission made six recommendations in its first year, including several that produced legislation in the General Assembly. At the conclusion of the Commission’s second year, it endorsed 12 recommendations made by the Task Force to address <u>school leader preparation, professional development and support for school leadership.</u> • A number of those recommendations are incorporated into the proposed licensure and approved program regulations including: <ol style="list-style-type: none"> 1. <u>Alignment of the internship with “real life” experiences</u> by providing for a 440-hour internship, with 320 of those hours to be a “supervised, structured experience.”

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			<ol style="list-style-type: none"> 2. <u>Preparation programs will be more sternly evaluated</u>, with separate accreditation and biennial approval being required. 3. <u>A two-tiered licensure system</u> composed of required (Level I) and optional (Level II) components is provided. Part of the Level II endorsement is completion of a <u>formal induction/mentoring program</u> as a principal or assistant principal. 4. <u>Adjunct faculty are to actively be involved</u> on bodies that oversee programs of the professional education program, and will be provided with appropriate resources to ensure quality preparation of school personnel.
12/7/2006	Megan Tschannen-Moran	Associate Professor Educational Policy, Planning and Leadership The College of William and Mary	<p>I am here tonight to speak to two proposals before the Board. Our program is widely regarded as one of the most rigorous school leadership preparation programs in the Commonwealth, and has been recognized at the national level as an innovative and effective program.</p> <p>I urge the Virginia Board of Education to revise the proposed Licensure Regulation to ensure greater knowledge and competencies of people who are granted such an important professional license in the proposed modifications to 8 VAC 20-22-590 Section B (p. 53).</p> <p>A professional, by definition, is a person who has mastered a body of specialized knowledge to be used in the service of clients and who has adopted a set of ethical standards to protect the interests of those clients. Professional practice is regulated by licenses because of the potential harm that may come to clients who put their trust in a professional who does not hold the requisite knowledge or uphold ethical standards of practice.</p> <p>The Virginia Board of Education proposed to grant any person with a Master’s degree in any subject a permanent, renewable, and portable professional license in school administration and supervision upon the recommendation of a superintendent, as little as two courses in leadership preparation, and the passage of a simple test. These persons would not have to hold a teaching license or have any experience in a K-12 setting, and yet they would be charged with the oversight of the instructional program of a school and the supervision of teachers and other school personnel.</p> <p>There is no provision in the proposal of accountability for superintendents who nominate a person who proves to be ill-prepared or ill-suited to the oversight of public funds</p>

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			<p>and to the education of our children. There are no protections against nepotism or political favoritism. If the person granted such a license turns out to be problematic and is asked to step down, he or she will still have a professional license to take elsewhere in Virginia or even to other states with reciprocity agreements with Virginia.</p> <p>I am alarmed at the prospect of harm that may come to the school children of our Commonwealth at the hands of persons lacking in the knowledge of instruction and the management of public resources. Our schools and our students are too precious to be entrusted to someone unable or unwilling to be properly trained to meet professional standards. This proposal is incongruous with the concerns for high standards usually shown by the Virginia Board of Education, and should be rejected.</p> <p>Please change the proposed modification to additionally require:</p> <ol style="list-style-type: none"> 1. Demonstration of proficiency in special education, school finance, and instructional leadership, as well as successful completion and/or meeting of the Child Abuse Recognition and Intervention training and the Technology Competencies required of classroom teachers. 2. Written attestation from the recommending superintendent that the candidate for licensure has had a. A minimum of five years of high performance in a leadership role in a previous position or career b. relevant experiences pertaining to leading, managing, or conducting instructional or training programs, whether with children or with adults. 3. That the hiring school division must provide a supervised internship, parallel to that required of a candidate entering the profession through the approved program route. The candidate must have a trained mentor. The candidate would work for the first year on a local license and would not receive a permanent license until successful completion of the internship. <p>If these conditions are not met, candidates recommended by superintendents to assist with situations of extreme shortage should be granted only local, provisional licenses, in keeping with current practice.</p>

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12/4/2006	Starr Rowe Denise Hunt Eddie P. Antoine, II Eddie P. Antoine, II	Director of Human Resources Culpeper Public Schools Recruitment and Licensure Specialist Culpeper Public Schools President Virginia Association of School Personnel Administrators Assistant Superintendent Human Resources and Staff Support Newport News City Public Schools	<p>8VAC20-22-590. Level I and Level II Administration and Supervision PreK-12 endorsement</p> <p>The proposed Career Paths for teachers, implicit in the differentiation of levels will be the expectation for salary differentiation by those who aspire to and achieve Level II. Thus, if this change is adopted, funding from the state must follow or like the Career Paths option, school divisions will be handed another unfunded mandate.</p> <p>Finally, to state that those Level I individuals who do not aspire to building leadership roles may work central office positions without taking and passing the school leaders assessment prescribed by the Board of Education does not support administrative career progression for instructional administrative personnel. Specifically, since according to Code 22.1-294 those supervisors are eligible for continuing contracts, the possibility exists that one could remain in the central office for years, thus denying career ladder progression of teachers and assistant principals who as part of the natural growth process in a school division would desire to have central office experience. Thus if this provision is adopted, 22.1-294 should be amended to state that those persons working in a central office position who have not taken and passed the school leaders assessment are not eligible to attain continuing contract status as a supervisor.</p>
12/1/2006	Dr. John R. Goss, III Dr. H. Jurgen Combs Dr. Pam Stockinger Dr. Larry Brooks	Associate Dean for Graduate Studies Director, Teacher Licensure Director, Master's in Teaching Program Director, Master's in Administration Program Shenandoah University	<p>While it will be challenging to implement, we support the revision of the administrative licensure requirements as it will produce more effective educational leaders.</p>

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undated	Mary Jo S. Howarth	Special Education Teacher	I do not support the elimination of the teaching experience requirement for the Administration and Supervision of PreK-12 endorsement. In 1994 the Interstate School Leaders Licensure Consortium established an education policy framework for school leadership. Each of their six standards begins with “A school administrator is an educational leader.” I believe that an educational leader is one who understands the curriculum because they have personal experience teaching it to students. An educational leader is one who can observe their teachers and students, evaluate the instruction that is taking place, and provide feedback and guidance to improve the educational process. If this change is implemented, principals will become nothing more than business managers.
Undated	James R. Amaral	President, District 9 Virginia Education Association	In regard to the current proposal for an alternative route to administration and supervision certification, Licensure Code SVAC20-22-590 does not require individuals to have taught in the classroom. I strongly encourage you to require those who provide curriculum leadership as well as hire and evaluate instructional staff to have a minimum of three years of classroom teaching experience. Administrators who have never taught in the classroom are limited to what they have learned in college classes and research studies to choose, evaluate, and lead teachers. However, those who have come from the classroom have first-hand knowledge of teaching that enables them to adapt pedagogic knowledge with the realistic dynamics of the classroom setting, and, as a result, are able to better create a learning environment that helps students achieve.
11/26/2006	Lois H. Stanton	President Chesterfield Education Association	Providing multiple options for licensure is appropriate; however, I am concerned about the current proposal (8VAC20-22-590) for an alternative route to administration and supervision endorsement because of the lack of a teaching requirement. The teaching requirement is critical for someone who is responsible for the leadership and evaluation of the teaching staff and the ultimate academic success of students.
9/20/2005	Sandra B. Cohen	Director, Teacher Education, Curry School of Education, UVA	8 VA C20-22-40:Conditions for licensure: We question how this will be verified and who will have to certify the applicant’s character?
11/29/2006	Jeff Cobb	Vice-President Virginia Education Association	There is no substitute for teaching to properly prepare administrators and supervisors for educational leadership. Nobody can fully understand and appreciate what it takes to be a successful teacher, and therefore provide appropriate leadership and evaluation of a teaching staff,

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			<p>unless they have demonstrated success in the classrooms themselves. The business of education is teaching, and this is where all education leaders should begin their work...and perhaps return from time to time, as we know that teaching in 2006 has changed quite a bit within just the past few years. Therefore, VEA strongly opposes the current proposal for an alternative route to teaching and administration.</p>
9/19/2006	<p>Shawn Finerty</p> <p>Debra Reader</p>	<p>Licensure Coordinator Fairfax County Public Schools</p> <p>Director, Employment Services Fairfax County Public Schools On behalf of the Region IV Human Resources Directors</p>	<p>We support: Alternative Route to Administrative Licensure. This could be utilized in the event of critical shortage or unique need.</p>

Speech-Language Pathologist Comments

Date	Name	Title and Organization	Speech-Language Pathologist Comments
9/5/2005	Jessica J. Norton	Speech-Language Pathologist, M.S. CCC-Speech-Language Pathologist, Speech-Language-Hearing Association of Virginia (SHAV) (Vice President)	<p>SHAV would like to offer more detailed comments on the proposed addition of speech-language pathology assistants to the state licensure regulations which were discussed at the Board of Education meeting on July 27, 2005.</p> <p>First, SHAV fully supports the move of Speech-Language Pathologists from a Postgraduate Professional license to a Pupil Personnel Services license (§ VAC 20-22-670). The elimination of the Praxis I assessment will reduce the number of nationally certified Speech-Language Pathologists who move to a medical setting where these assessments are not required.</p> <p>Second, SHAV suggests renaming the master’s degree licensure currently Special Education: speech-language disorders preK-12, to Speech-Language Pathologist. This title is defined in the Code of Virginia and reflects the training and expertise of the master’s degree professional. This change will also help reduce the perception that requirements and training for school-based Speech-Language Pathologists are somehow different than those required by the medical setting.</p> <p>The last area of comment is regarding the addition of the speech-language pathology assistant. SHAV has grave concerns regarding the proposed endorsement of speech-language pathology assistants (§ VAC 20-22-540). Because of the current shortage of Speech-Language Pathologists in the public schools we fear that these assistants may be misused and assigned caseloads which they are not prepared to handle. If these assistants were given the job of directly planning and caring for students with speech-language impairments, not only would the quality of services decline and professional competence be compromised, but more importantly the Commonwealth’s children would suffer. Speech-language pathology assistants cannot be used to supplant, only to supplement, the services provided by nationally-certified Speech-Language Pathologists. Since these assistants are not trained for independent practice.</p> <p>The American Speech-Language-Hearing Association (ASHA) has established guidelines and competencies for assistants and a summary of these are: 75% of</p>

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			<p>teachers reported that students demonstrated improved reading/reading comprehension skills following treatment by a certified Speech-Language Pathologist. 93% of parents surveyed felt that their child's communication skills had improved. Proving the need for pathologist's with Master's degrees.</p> <p>Virginia's Speech-Language Pathologists are already overloaded with cases and an added training and supervision of assistants is not the answer to the situation. The supervising Speech-Language Pathologist must be involved in deciding how much supervision is necessary for each assistant he or she agrees to supervise, and how his or her caseload/workload will need to be adjusted. There is not one model for this situation, the amount and frequency of supervision will need to be determined on a case by case situation. School divisions may want to consider salary supplements, or some other incentive, for supervising Speech-Language Pathologist's. ASHA has developed guidelines for supervisors which we would be happy to share with you.</p> <p>SHAV feels the quality of service to the children of the Commonwealth would be greatly diminished if assistants were permitted to carry a caseload. SHAV is aware of divisions who currently employ bachelor's level staff as Speech-Language Pathologist's, which is not permitted under the current regulations; so there seems to be no way of tracking appropriate interpretation and use of these assistants. SHAV is concerned that many school divisions with vacant positions may be unaware that these assistants are not properly trained to serve students with disabilities, and that they do not meet the requirements of the Regulations Governing Special Education Services for Students with Disabilities. Please provide a clear statement that says speech-language assistants cannot practice independently and must have supervision of a master's level pathologist.</p> <p>Additional Information: Phone Number: 434-924-6318. SHAV lobbyist David Bailey or Bonnie Atwood: 1-804-643-5554.</p>
11/22/2005	Kathleen Sisk	MS, CCC-Speech-Language Pathologist	<p>Concern with the Praxis I for Speech-Language Pathologists.</p> <p>Most Speech-Language Pathologists graduate with a Master's Degree and have often taken the Praxis I for their national certification through American Speech and Hearing Association. Maintaining our certification requires 10 continuing hours of credit a</p>

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			<p>year. These are ASHA approved credits, and if we are employed by the school system, these are in addition to the hours required to maintain our educational licensure. It is our strong belief that the ASHA credentials are considered the highest form of qualification in our profession, reflecting the training and expertise required for our degree, and we feel this certification should be accepted in lieu of the Praxis.</p> <p>As a professional in the field of speech and language pathology, I urge you no to allow independent practice by speech-language pathology assistants. It is a clear indication from the degree of education we are required to obtain, that an assistant without the background or expertise would be compromising the quality of services provided to the children of our public schools. Assistants will not address the shortages in our schools. This is not to say the position of the assistant does not have a need; however, to allow unregulated use of assistants without clear, strict guidelines in a state that values the quality of their educators and the outcome for their children, would be truly a disservice to other professionals and to the children they serve.</p>
9/20/2005	Anastasia Raymer, Ph. D.	Associate Professor of Speech Pathology, Old Dominion University	<p>I would like to express my concerns over plans to modify qualification of personnel providing speech-language pathology services to students in public schools. The proposed plan to institute a credential for Speech-Language Pathologist Assistants has the potential to seriously downgrade the quality of services provided to needy students. As a professor I see the students who would some day take positions of Speech-Language Pathologist Assistants. While some of these individuals are perfectly strong candidates for Speech-Language Pathologist Assistant's, others are dreadfully under qualified to carry on a plan of action, even if the plan was developed by a certified Master's degreed speech-pathologist.</p> <p>When I first heard about the effort to endorse Speech-Language Pathologist Assistant's, I took heart in the fact that they would be required to pass the Praxis I. Then I learned it may not be required and I feel the children of Virginia's public schools would not get the same quality services if our low end students were hired.</p> <p>I also believe this move would deter Masters level speech pathologists from taking positions in public schools. The Speech-Language Pathologists would now be responsible for an enormous caseload, despite the fact that Speech-Language Pathologist Assistants</p>

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>may be carrying out educational plans. Ultimately it is the Speech-Language Pathologist that is responsible for outcomes.</p> <p>My fear is that the whole plan may ultimately lead to degradation of the quality of services in the Commonwealth. If the Speech-Language Pathologist Assistant endorsement is to be initiated there need to be carefully established guidelines, many of which have been delineated by the ASHA.</p>
9/20/2005	Tanya Peterson	Speech-Language Pathologist	<p>I support the change in license from Postgraduate Professional to Pupil Personnel Services license. I also support renaming the Master’s degree licensure from Speech-Language Disorders preK-12 to Speech-Language Pathologist, a title which reflects the training an expertise of a Master’s degree.</p> <p>I do not support the Speech-Language Pathologist assistants as it is currently written. They are not properly trained to work individually and do not meet the requirements of the regulations governing special education. Assistants would tarnish qualified SPL’s reputation. Speech-Language Pathologist assistants must have supervision from a licensed Master Degreed Speech-Language Pathologist. Care must be taken to avoid over burdening Speech-Language Pathologist Assistant’s with supervisory duties which directly impact and reduce time appropriated for therapy, assessment and consultation.</p>
9/30/2005	Dawn B. Hamilton, M.S. CCC- Speech-Language Pathologist	Speech-Language Pathologist	<p>Regarding the need for Speech-Language Pathologist to pass the Praxis I</p> <p>I support the proposed change in licensure for Speech-Language Pathologist in the schools from Postgraduate Professional license to a Pupil Personnel Services license (VAC 20-22-670). Speech-Language Pathologist, like occupational and physical therapists, are not teachers of core curriculum. We are trained in remediation of communication disorders (both speech and language). We have also passed a national certification exam...I do not feel the Praxis I is beneficial or necessary requirement for Speech-Language Pathologists to work in schools. The Praxis may be seen as a deterrent to those seeking positions in the shortage areas in schools. The name change would also reflect the training and expertise of holding a master’s degree.</p> <p>Assistants can be valuable in certain settings and situations, any endorsement should clearly state that these assistants cannot practice independently and require ongoing supervision from a licensed, master’s degreed Speech-Language Pathologist. The services</p>

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>that are available for training assistants are limited. Simply, these assistants do not have the high quality training that master's degreed Speech-Language Pathologists have. Considering "No Child Left Behind" these assistants do not meet the highly qualified status.</p>
9/29/2005	Eileen Abrahamsen	Old Dominion University	<p>I support the proposal to move Speech-Language Pathologist from Postgraduate Professional license to a Pupil Personnel Services license. The title Speech-Language Pathologist should also be used. Speech-Language Pathologists should be considered with psychologists and social workers, we are not a sub-specialty of special education. A Speech-Language Pathologist with a Master's Degree should be the provider of services in the schools. It is unfair that those students who cannot afford a private specialist do not get the same services, such as through the two-tiered system being proposed. It is separate and not equal.</p> <p>Changes like these will ensure that children with communication disorders will be more likely to achieve in school. As well as make Speech-Language Pathologists valued professionals.</p> <p>I do not support the proposal of a new endorsement of Speech-Language pathology assistants. The students of the Commonwealth should get the most highly qualified Speech-Language Pathologist.</p>
No Date	Lynn McElvain, MS CCC-Speech-Language Pathologist	Speech-Language Pathologist	<p>I support the proposal to move Speech Pathology to a Pupil Personnel Services license. These are the reasons:</p> <ul style="list-style-type: none"> - Speech Pathologists are not classroom teachers. They do however, perform services on IEP's. -It is very costly to uphold and maintain 3 different licenses and stay current with continuing education requirements (Teaching, ASHA, and VA State license) -Occupation and Physical Therapists do not need teaching licenses, thus we should not either. - This move would decrease the need to contract with staffing companies in which saves schools money. -Moving the licensure to Pupil Personnel Services will entice more Speech Pathologists to work in a school-based setting. <p>This change is essential!</p>
9/22/2005	Karen Jackson CCC- Speech-Language Pathologist	Speech-Language Pathologist	<p>Reactions to proposals before the state:</p> <ol style="list-style-type: none"> 1. Support the move of a speech-language pathologist from a Postgraduate Professional license to a Pupil Personnel Services license. Speech-Language Pathologists have a high degree of preparation that surpasses the requirements of general education teachers in

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>our public schools. We are an asset and should not hold the same license as a teacher.</p> <p>2. SHAV has grave concerns regarding a new proposed endorsement of speech-language pathology assistants. Candidates who only have a Bachelor’s degree today do not have the appropriate training to meet Speech-Language Pathologist responsibilities. Mentoring is needed and I do not believe these assistants would get less supervision than the role is designed and mandated. Also, school divisions trying to cut costs will lessen Speech-Language Pathologist roles and greaten Speech-Language Pathologist Assistants responsibilities. Students will not be served.</p> <p>There is a current philosophy that Speech-Language Pathologist in the schools are more educators than therapists. Speech-Language Pathologist s support student’s educational performances. Nothing is separate, but Speech-Language Pathologists have a degree of expertise and training that is essential for many students.</p>
9/27/2005	Woodrow W. Mullins, Jr.	Retired Superintendent Tazewell County Schools	<p>Viewpoints concerning Speech-Language Pathologists licensure in public school setting.</p> <p>As you are well aware Speech-Language Pathologist are trained to perform a service to children with speech-language needs and should not be classified as a teacher. Many excellent Speech-Language Pathologists could perform their task much better and probably more cost effective with a favorable change.</p> <p>I strongly support the change of licensure from Postgraduate Professional to Pupil Personnel Service.</p>
<p>10/26/2005</p> <p>No Date</p> <p>No Date</p> <p>No Date</p> <p>No Date</p> <p>No Date</p>	<p>Susan Fullerton, M.S. CCC- Speech- Language Pathologist</p> <p>S. Michelle Sisk</p> <p>Kristen M. Riley, CCC- Speech- Language Pathologist</p> <p>Peggy Littrell</p> <p>Erin Johnson</p>	<p>Speech-Language Pathologist</p> <p>Speech-Language Pathologist Lynchburg, Virginia</p> <p>Speech-Language Pathologist</p> <p>Principal, Dudley Elementary</p> <p>Speech-Language Pathologist</p>	<p>I am writing to support and encourage the proposed move of Speech-Language Pathologist from a Postgraduate Professional license to a Public Personnel Services license (§ VAC 20-22-670). SHAV, Speech-Language Pathologist and school personnel strongly support this move and desire immediate action to take place!</p> <p>This means renaming the master’s degree licensure, currently Special Education: Speech Disorders preK-12, to Speech-Language Pathologist. This title is defined in the Code of Virginia and reflects the training and expertise of the Master’s degree professional. Simply, stated Speech-Language Pathologist are not teachers! Speech-Language Pathologists are explicitly trained to perform a service to children with speech-language needs.</p>

Date	Name	Title and Organization	Speech-Language Pathologist Comments
No Date	Sharon Lynch, MS CCC- Speech- Language Pathologist	Speech-Language Pathologist	
No Date	Tara Floyd, MS CCC- Speech- Language Pathologist	Speech-Language Pathologist, Rocky Mt. Elem. School	
9/20/2005	Beth Wilson, MA CCC- Speech- Language Pathologist	Speech-Language Pathologist	
No Date	Randy Walker, M.S. Speech- Language Pathologist	Speech-Language Pathologist, Boones Mill Elem.	
No Date	Leslie Hirovatie Miranda Nurteryl	Early Childhood Teacher, Round Hill Montessori, Roanoke VA	
No Date	Harry Stewart	Speech-Language Pathologist	
No Date	Victor Nairel	Speech-Language Pathologist	
No Date	Julie Sandsamier	2 nd grade teacher, Burlington Elementary	<p>I am writing to support and encourage the proposed move of Speech-Language Pathologist from a Postgraduate Professional license to a Public Personnel Services license (§ VAC 20-22-670). SHAV, Speech-Language Pathologists and school personnel strongly support this move and desire immediate action to take place!</p>
No Date			<p>This means renaming the master's degree licensure, currently Special Education: Speech Disorders preK-12, to Speech-Language Pathologist. This title is defined in the Code of Virginia and reflects the training and expertise of the Master's degree professional. Simply, stated Speech-Language Pathologist are not teachers! Speech-Language Pathologists are explicitly trained to perform a service to children with speech-language needs.</p>
No Date	Rebecca L. Jamison	Speech-Language Pathologist	<p>I see no reason for Speech-Language Pathologists to have a teaching license-They are not teachers!</p>
No Date			<p>I am writing to support and encourage the proposed move of Speech-Language Pathologist from a</p>

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>Postgraduate Professional license to a Public Personnel Services license (§ VAC 20-22-670). SHAV, Speech-Language Pathologists and school personnel strongly support this move and desire immediate action to take place!</p> <p>This means renaming the master’s degree licensure, currently Special Education: Speech Disorders preK-12, to Speech-Language Pathologist. This title is defined in the Code of Virginia and reflects the training and expertise of the Master’s degree professional. Simply, stated Speech-Language Pathologists are not teachers! Speech-Language Pathologists are explicitly trained to perform a service to children with speech-language needs.</p> <p>Speech-Language Pathologist s re trained to carry out specific interventions and treatments for speech delays and disabilities. They are not trained in delivery of classroom instruction or in content knowledge, nor do they need these courses to fulfill their job requirements. It is ridiculous to require them to pass a test (Praxis I) that even education majors have trouble passing. This professional classification and the required licensure assessments are inappropriate-it’s high time we change it.</p>
No Date	Katrina L. Beisser	Speech-Language Pathologist	<p>I am writing to support and encourage the proposed move of Speech-Language Pathologist from a Postgraduate Professional license to a Public Personnel Services license (§ VAC 20-22-670). SHAV, Speech-Language Pathologist s and school personnel strongly support this move and desire immediate action to take place!</p> <p>This means renaming the master’s degree licensure, currently Special Education: Speech Disorders preK-12, to Speech-Language Pathologist. This title is defined in the Code of Virginia and reflects the training and expertise of the Master’s degree professional. Simply, stated Speech-Language Pathologist are not teachers! Speech-Language Pathologist s are explicitly trained to perform a service to children with speech-language needs.</p> <p>Speech-Language Pathologists do not provide classroom instruction.</p>
No Date	Betsy Call MS CCC- Speech-Language Pathologist	Speech-Language Pathologist	<p>I am writing to support and encourage the proposed move of Speech-Language Pathologist from a Postgraduate Professional license to a Public Personnel Services license (§ VAC 20-22-670). SHAV, Speech-Language Pathologists and school personnel strongly support this move and desire immediate action to take place!</p>

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			<p>This means renaming the master’s degree licensure, currently Special Education: Speech Disorders preK-12, to Speech-Language Pathologist. This title is defined in the Code of Virginia and reflects the training and expertise of the Master’s degree professional. Simply, stated Speech-Language Pathologists are not teachers! Speech-Language Pathologists are explicitly trained to perform a service to children with speech-language needs.</p> <p>We desperately need this change! It is costing Washington County Schools so much money to contract with companies because we cannot keep Speech-Language Pathologists. All of the licensure requirements are killing us to keep Speech-Language Pathologists and hire them. We need help! Please consider this rightful and deserving change.</p>
No Date	Virginia L. Foster, Speech-Language Pathologist	Speech-Language Pathologist	<p>I am writing to support and encourage the proposed move of Speech-Language Pathologist from a Postgraduate Professional license to a Public Personnel Services license (§ VAC 20-22-670). SHAV, Speech-Language Pathologists and school personnel strongly support this move and desire immediate action to take place!</p> <p>This means renaming the master’s degree licensure, currently Special Education: Speech Disorders preK-12, to Speech-Language Pathologist. This title is defined in the Code of Virginia and reflects the training and expertise of the Master’s degree professional. Simply, stated Speech-Language Pathologists are not teachers! Speech-Language Pathologists are explicitly trained to perform a service to children with speech-language needs.</p> <p>This change must happen! We need to keep our profession alive! Speech-Language Pathologists are not teachers! I work with Occupational Therapists and Physical Therapists in the school setting- they are not required to have a teaching license- Speech-Language Pathologists should be held with the same regard. We have 2 licenses that we are required to have in the state of Virginia that are required to qualify as Speech-Language Pathologists.</p>
No Date 10/4/2005 10/4/2005	Sharon Swaha, MS CCC-Speech-Language Pathologist Margaret R. McMillan M.S. CCC- Speech-Language Pathologist	Speech-Language Pathologist Speech-Language Pathologist, Pulaski County Schools	<p>I support the proposal to move Speech Pathology to a Pupil Personnel Services license. These are the reasons:</p> <ul style="list-style-type: none"> - Speech Pathologists are not classroom teachers. They do however, perform services on IEP’s -It is very costly to uphold and maintain 3 different licenses and stay current with continuing education requirements (Teaching, ASHA, and VA State license) -Occupation and Physical Therapists do not need teaching licenses, thus we should not either.

Date	Name	Title and Organization	Speech-Language Pathologist Comments
	Teresa A. Bookman, M.S. CCC- Speech-Language Pathologist	Speech-Language Pathologist, Pulaski County Schools	<p>- This move would decrease the need to contract with staffing companies in which saves schools money.</p> <p>-Moving the licensure to Pupil Personnel Services will entice more Speech Pathologists to work in a school-based setting.</p> <p>This change is essential!</p>
9/26/2005	L. Magorala MD OB/GYN	OB-GYN	This is a letter to support a greatly needed change to move Speech Pathologist to a Pupil Personnel Service License. This move is extremely critical because:
9/26/2005	Tina Meade, M.S. CCC- Speech-Language Pathologist	Speech-Language Pathologist	<ol style="list-style-type: none"> 1. Speech Pathologists performs a service as stated on the IEP, not classroom instruction. Speech-Language Pathologists are trained to evaluate and treat speech-language disorders. We are not trained for classroom instruction.
9/26/2005	Shannon Best, M.S. CCC- Speech-Language Pathologist	Speech-Language Pathologist	<ol style="list-style-type: none"> 2. More Speech-Language Pathologists would be attracted to work in a school-base setting. Then, this will make Speech-Language Pathologists accountable for 2 licenses- American Speech Hearing Association (ASHA) and Virginia State license instead of 3 (ASHA, VA State license and a “teaching license”) This is very expensive for Speech-Language Pathologists. A teaching license is not applicable in other settings. That really drives a great number of Speech-Language Pathologists to work in a private setting or with staffing companies.
No Date	Karen Badadoh	Physical Therapist	<ol style="list-style-type: none"> 3. Money! It costs school systems more money to contract speech services with staffing companies. Many school systems, especially in rural areas, are faced with this route because there are not enough SPEECH Speech-Language Pathologists to cover caseloads, no applicants, and/or Speech-Language Pathologists do not have all 3 licenses. **A qualified Speech-Language Pathologist only needs ASHA and a VA State license. These licenses are only applicable in other settings—not the Postgraduate Professional license.
No Date	Laura Chapman, PT-Assit.		<ol style="list-style-type: none"> 4. Occupational and physical therapists are not required to have a “teaching license” to perform their services----the same should be true to Speech-Language Pathologists. This makes good logical sense to move Speech-Language Pathologists to the Pupil Services licensure.

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>This is simple common sense. Please support this move!</p>
No Date	Nancy and Larry Davis	Parents	<p>This is a letter to support a greatly needed change to move Speech Pathologist to a Pupil Personnel Service License. This move is extremely critical because:</p> <ol style="list-style-type: none"> 1. Speech Pathologists perform a service as stated on the IEP, not classroom instruction. Speech-Language Pathologists are trained to evaluate and treat speech-language disorders. We are not trained for classroom instruction. 2. More Speech-Language Pathologists would be attracted to work in a school-base setting. Then, this will make Speech-Language Pathologists accountable for 2 licenses- American Speech Hearing Association (ASHA) and Va State license instead of 3 (ASHA, VA State license and a “teaching license”) This is very expensive for Speech-Language Pathologists. A teaching license is not applicable in other settings. That really drives a great number of Speech-Language Pathologists to work in a private setting or with staffing companies. 3. Money! It costs school systems more money to contract speech services with staffing companies. Many school systems, especially in rural areas, are faced with this route because there are not enough Speech-Language Pathologists to cover caseloads, no applicants, and/or Speech-Language Pathologists do not have all 3 licenses. **A qualified Speech-Language Pathologist only needs ASHA and a VA State license. These licenses are only applicable in other settings—not the Postgraduate Professional license. 4. Occupational and physical therapist’s are not required to have a “teaching license” to perform their services----the same should be true to Speech-Language Pathologists. This makes good logical sense to move Speech-Language Pathologists to the Pupil Services licensure. <p>This is simple common sense. Please support this move!</p> <p>I, being in the health field as a licensed nurse, feels that Speech-Language Pathologists should be under a</p>

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>separate license to practice. Their training has taken place in a medical teaching environment to improve and develop speech-language skills to better understand and learn classroom teaching. They have been taught the higher learning of teaching with the purpose of no child or adult be left behind in any aspect of life. To deter them from their services to the needy because of a standardized test is a gross disservice.</p>
9/26/2005	Carole McElvain		<p>There is a shortage of Speech-Language Pathologists to meet the needs of students.</p> <p>A qualified Speech-Language Pathologist maintains a certification by ASHA as well as the state of Virginia. To require a teaching license in addition, adds an additional financial burden. Speech-Language Pathologists perform a service as stated on the IEP. They are not trained for classroom instruction. The necessity of maintaining a teaching license has driven many qualified Speech-Language Pathologists to work in a private setting or with staffing companies.</p> <p>I would encourage the Board of Education to support the move of Speech-Language Pathologist from a Postgraduate Professional. License to a Pupil Personnel Services license (§VAC 20-22-670). This means renaming the Master’s degree licensure, currently Special Education: Speech Disorders PreK-12, to Speech Language Pathologist.</p>
9/22/2005 9/22/2005 9/22/2005	Sara Jones McNamara, MCS, CCC- Speech- Language Pathologist Lynn Adams, PhD Cynthia Donoghue	Legislative Councilor, American Speech, Hearing, Language Association Legislative Councilor, American Speech, Hearing, Language Association Legislative Councilor, American Speech, Hearing, Language Association	<p>Member of SHAV.</p> <p>We are not happy that Virginia Speech-Language Pathologists working in the schools are not governed by the state Board of Audiology & Speech-Language Pathology. Your “licensure” is confusing & has lesser standards than does real state licensure. We are even more concerned that the DOE is messing with the Speech-Language Pathologists and their assistants in Virginia schools. Speech-Language Pathologist Assistants don’t need DOE endorsement. They can not be used to supplant Speech-Language Pathologists. Assistants are not trained for independent practice. Speech-Language Pathologist caseloads in Virginia are already way too high. Adding to their workload with the training & supervision of assistants is not an answer to your perceived shortage of Speech-Language Pathologists! (to fill open positions pay them what we are worth (\$65-90K), give them decent places to work, a caseload of 16-25, the respect they deserve, treat them like the medical professionals we are, and give them materials as well as a reasonable portion of the money their numbers bring into the school district.)</p>

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>One model of supervision will not work state wide.</p> <p>ASHA has established guidelines and competencies for assistants which SHAV has sent to you. You must not give Speech-Language Pathologist Assistants case loads. Please add the definition of a speech assistant to section A of 8 in VAC 20-22-540 so superintendents are very clear about this.</p>
9/26/2005	Maria Papazis, Speech-Language Pathologist	Speech-Language Pathologist, Jacox Elem. School	<p>Please Consider:</p> <ol style="list-style-type: none"> 1. Moving Speech-Language Pathologists from a Postgraduate Professional License to a Pupil Personnel License (8 VAC 20-22-670) and renaming the master’s degree licensure, currently Special Education: speech-language disorders PreK-12, to Speech-Language Pathologist. This title is defined in the Code of Virginia. 2. Including a clear statement that Speech-Language Pathologist Assistants cannot practice independently and must have ongoing supervision from a licensed master’s degreed Speech-Language Pathologist. This would guide school personnel to use Speech-Language Pathologist Assistants properly.
9/30/2005	Valeria Lawrence	Speech-Language Pathologist	<p>Saying “yes” to the proposals and concerns of SHAV to the State Board of Education.</p> <ol style="list-style-type: none"> 1. Eliminate the Praxis for Speech-Language Pathologists with masters degrees. 2. Renaming of licenses 3. Specific duties for speech-language assistants with supervision.
9/19/2005	Gail B. Boster, MA CCC-Speech-Language Pathologist	Speech-Language Pathologist	<p>Support elimination of Praxis I for Speech-Language Pathologists as well as the change of license name. Also, Speech-Language Pathologists should not independently serve students with speech-language impairments.</p>
12/5/2006	Ms. Sandra Woolfender	Speech-Language professional	<ul style="list-style-type: none"> • Concerned about proposal for speech-language assistants • The problem now is retaining trained clinicians; we need to keep the clinicians we have by providing clerical assistance, perhaps paying for licensure fees, etc. • Assistants would not be fully qualified and we, as qualified clinicians, would have another person to supervise.
12/5/2006	Ms. Sally Jones McNamara	Certified speech-language pathology professional and legislative councilor with ASHA-Virginia	<ul style="list-style-type: none"> • Emphasized credentials in speech-language pathology • She served on task force looking at idea of assistants • Emphasized potential abuse of assistants • Noted that caseloads were already astronomical (68+) and that the supervision and paperwork involved with assistants would simply add to that

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<ul style="list-style-type: none"> • Said divisions should pay more for experience and certifications in the area of speech-language pathology • Suggested that state follow the ASHA guidelines for assistants
12/5/2006	Ms. Barbara Fiskey	Speech-language pathology professional	<ul style="list-style-type: none"> • Noted that she co-chairs the Fairfax Speech-Language Pathology Association • She is extremely concerned about the qualified speech-language pathologists who would be burdened with extra work of supervising and doing paperwork for assistants • It can't be done in a four-year program • Urged BOE to consider very seriously the idea that assistants will be barriers to developing fully qualified speech-language pathologists
12/5/2006	Ms. Beth Johnson	Speech-language pathology professional	<ul style="list-style-type: none"> • There is currently a shortage of speech-language pathologists in Fairfax and other areas • Assistants will be a "band-aid" • Already we have a caseload of 68+ and 45 is the recommended number by our professional association • I'm certified and then I'm being asked to supervise another person! No! • A B.A. program typically would not have 500 hours of clinical experience • Assistants would not get appropriate supervision
12/7/2006	Dr. Eileen Abrahamsen, CCC-SLP		<p>I wish to express my concerns regarding the proposed licensure for speech-language pathology assistants in the schools. I teach speech language pathology at the university level, I am on the Board of the Speech Language and Hearing Association of Virginia and have been a speech-language pathologist for over 35 years. About 40 years ago, ASHA established the master's degree as the entry level for practice. Hospitals, clinics, private practices, and insurance companies soon required this level of expertise to assure quality service. School systems across the nation were slower to respond to this mandate. Back then, speech pathologists were called "speech teachers". Their caseloads were top heavy with lisps, /r/ distortions and a few children who stuttered. Federal law mandating a free and appropriate education for all children changed that. Now we have a zero reject mandate. Technological advances allow children with serious physical and cognitive disabilities to survive premature birth. There is an increase in the incidence and prevalence of children with autistic spectrum disorders and speech language pathologists are more actively involved in fostering literacy skills.</p> <p>At recent ASHA survey indicated about a third of</p>

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			<p>school based SLPs have at least one child with a swallowing disorder dysphagia, on their caseload. This is a graduate level course. Other pertinent graduate courses include assessment of these disorders and evidence based, scientifically supported approaches to the treatment of children with autistic spectrum disorders and phonological awareness disorders related to literacy.</p> <p>ASHA guidelines stipulate that graduate students should not be assigned a client with a specific disorder before acquiring the necessary academic training. There is no such restriction in the proposed standards for the SLPAs.</p> <p>If the SLPA license becomes fact, children of privilege will be able to afford private therapy from a fully qualified professional while less affluent families may have to settle for treatment from a less qualified practitioner. It is hard to imagine such a two-tiered system being tolerated.</p> <p>The proposed regulations have no requirements for ongoing supervision and no restriction on independent practice. Virginia universities are not prepared to provide the 500 clock hours of observation and clinical training proposed. In addition, graduate programs may only accept up to 50 hours of practicum acquired at the undergraduate level. This could prove to be a significant detriment to any assistant desiring a graduate degree.</p> <p>Finally, SLP's need to adhere to ASHA's code of ethics which prevents them from knowingly allowing assistants to perform duties outside of their scope.</p> <p>I respectfully request that you eliminate this proposed license.</p>
11/3/2006	Randy L. Jennings CCC/SLP	Speech-Language Pathologist Wythe County Public Schools	<p>I would like to comment on the Speech-Language Assistant Licensure. At present the guidelines call for B.S. level education; however, I question whether individuals with B.S. and is a SLPA will be compensated for the B.S.. I feel that it would be much wiser to have specially designed programs at the community college level for the SLPA. This will coincide better with the pay. Teachers are simply required to have a B.S. and will receive much better compensation than a SLPA with the same training.</p> <p>In addition, the SLPA will provide better services given a systematic training, with targeted skills, provided at a specially designed program at the community college level. Please consider these</p>

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11/5/2006	Clair Jacobson, Med, MS, AuD, CCC-A	SHAV President-Elect Professor Audiology Graduate Faculty Communication Sciences and Disorders Department James Madison University	<p>recommendations carefully.</p> <p>Concerns of the Speech and Hearing Association of Virginia regarding the proposal for Speech Assistants:</p> <p>Regarding the content knowledge of the practitioner: Undergraduate: In general, an undergraduate degree in speech-language pathology introduces students to the normal processes underlying communication. Some basic characteristics of communication disorders are also covered and may vary by the institution of higher education. Graduate: Dysphagia is taught at the graduate level. Literacy related language courses with train SLPs in scientifically proven, evidence based practice methods to foster phonological skills to improve decoding skills are at the graduate level. More advanced language intervention methods aimed at improving listening and reading comprehension are also graduate classes.</p> <p>Concerns: More and more medically fragile children are enrolled in our public schools. Literacy is a major focus in school achievement, AYP, NCLB, and Virginia SOL's. Current guidelines include courses on communication disorders but have no requirement that the assistant know anything about treatment of these disorders.</p> <p>Testing to identify disorders: Undergraduate: In general, undergraduate students have no courses related to choosing appropriate assessment instruments, evaluating the psychometric properties of tests used, or interpreting findings. Graduate: Graduate students take courses related to testing, evaluating psychometric properties of tests and interpreting findings. Most graduate programs introduce prospective SLPs to diagnostic practice in a gradual manner to assure quality. Concerns: There is no language in current regulations prohibiting SLPAs from administering or interpreting tests with or without supervision.</p> <p>Concerns regarding Provision of Therapy: Undergraduate: Most undergraduate training programs no longer provide practicum experiences at the undergraduate level. Most students do acquire the 25 hours of supervised observation hours ASHA requires prior to engaging in clinical practice. Graduate: ASHA guidelines state not only must the student have the 25 hours of observation and 375 hours clock hours [sic] in direct contact but that students "should be assigned practicum only after they have acquired sufficient knowledge base to qualify for such experience". In addition, ASHA has strict guidelines that institutions must follow to</p>

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			<p>document the amount of supervision required. During these clinical practicum experiences, clinicians learn to apply evidence based (scientific) therapy techniques.</p> <p>Concerns: The 250 hour observation and 250 hour experience provision are the vaguest part of the proposed guidelines. ASHA has guidelines for supervising assistants, paraprofessionals, CFY candidates and students. No supervisory requirements are mentioned in the regulations. Competencies regarding following directions are there but no stipulation of how closely (duration or frequency of time) a SLPA needs to be supervised. It is implied that a SLPA could carry an independent caseload. The prospective SLPA is not warned that graduate programs in SLP can only accept 75 hours of clinical experience earned prior to admission to a program should they later decide to pursue graduate work. SLPs with CCC may be put in jeopardy of violating ASHA’s code of ethics by “signing off” on treatment plans they have not had time to sully investigate due to their own caseload which is already too high.</p>
11/22/2006	Patricia C. Kohlbeck, M. Ed., CCC-Speech	Richmond City Public Schools Speech Pathologist	<p>I do not agree with the licensing of speech pathology assistants which would allow them to work independently of master’s level speech pathologists unless the design of current undergraduate programs in Virginia is changed. As a graduate of University of Virginia, I was given no clinical opportunities as an undergraduate and would have not been able to perform my duties as a public school speech pathologist without graduate training. As a clinician who has practiced in the public schools for 28 years I have seen a tremendous rise in the federally mandated meetings and paperwork related to the eligibility process. Furthermore, caseloads in the public schools are as high as ever and the number of students with communication disorders related to complex disabilities seems to be rising. As a clinician with many years of experience, a master’s degree, CCC, and state licensure I find m responsibilities more difficult to manage than ever. As I have observed, those with undergraduate training only begin to see their deficiencies and eventually leave to pursue higher education.</p>
11/29/2006	Lorane Manno CCC-SLP	Speech-Language Pathologist	<p>My thoughts are that SLP Assistants need to be provided specialized training that can result in a certificate. (The universities need to pick up on this one.) SLP As should not truly have an independent caseload. They can work with children under supervision, but clinical/education recommendations and decisions need to be made by the supervising SLP. The decision regarding salary can be made based on # of credits, amount of experience, etc. SLP</p>

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>As can be a valuable addition to the profession, but there must be clinical/educational guidelines regarding when and how assistants may be used. I don't think it's something to just "jump" in to. We have worked long and hard as a profession to develop our position in the hierarchy of Health care.</p>
12/14/2006	<p>Ann Johnson, M.S. CCC-SLP</p> <p>Kimberly DuPont, M.A., CCC-SLP</p> <p>Krista Smith, M.S. CCC-SLP</p> <p>Pamela Kugelman, M.S., CCC-SLP</p> <p>Molly Ferguson, M.A., CCC-SLP</p> <p>Jessica Abbott, M.S. CCC-SLP</p> <p>Kathy McCool, M.S. CCC-SLP</p> <p>Rachel G. Swoope</p> <p>Christine C. Buchanan, M.Ed., CCC-SLP</p> <p>Patricia Potocki</p> <p>Phillip M. Wishon</p> <p>Sandra J. Woolfenden</p> <p>Sheryl G. Baer</p> <p>Alyssa</p>	<p>Speech and Language Clinician Frost Middle School</p> <p>Speech/Language Pathologist Annandale Terrace Elementary</p> <p>Speech Clinician</p> <p>Speech/Language Pathologist Hayfield Elementary</p> <p>Speech and Language Clinician Thoreau Middle School Lemon Road Elementary School</p> <p>Flint Hill Elementary</p> <p>Speech-Language Pathologist Carl Sandburg Middle School</p> <p>Speech/Language Pathologist Cardinal Forest Elementary School</p>	<p>The Fairfax County Speech-Language Clinician's Association (FSLCA) would like to express concerns and recommendations regarding the endorsement of speech –language pathology assistants. The Virginia Department of Education (VDOE) suggests the following endorsement requirements:</p> <ul style="list-style-type: none"> • Speech-Language Pathology Assistant (SLPA) provides support under the support and supervision of a nationally certified Speech-Language Pathologist (SLP) • Completion of 500 clock hours in supervised education experiences for the job responsibilities of SLPA; 250 of these hours must be direct on-site observation of American Speech-Language-Hearing Association (ASHA) certified SLP; remaining 250 must be fieldwork experience in public school setting supervised by ASHA-certified SLP • One full year successful full-time experience as SLPA under supervision of ASHA-certified SLP in lieu of 500 clock hours • SLPA will have knowledge of: <ol style="list-style-type: none"> 1. normal process of communication, oral and written, as defined in the VA Standards of Learning 2. the foundation for education students with disabilities 3. the legal aspects and regulatory requirements associated with identification, education, and evaluation of students with disabilities 4. classroom management techniques and individual interventions 5. basic skills and processes of normal speech, language, communication, hearing development, language acquisition, and reading 6. various types of speech, language, voice, and hearing problems 7. service delivery practices 8. workplace behaviors 9. cultural factors including language and culture, nonverbal communication, sign language and other manually coded systems, bilingualism and multicultural

Date	Name	Title and Organization	Speech-Language Pathologist Comments
	Jurgensmeier		issues
	Lisa P. White		<p>FSLCA concerns regarding VDOE endorsement requirements are as follows:</p> <ul style="list-style-type: none"> undergraduate programs do not offer 500 hours of supervised education experiences undergraduate programs offer <u>observation</u> of clinical practice, not supervised education experiences such as providing direct services to children or adults under the guidance of an ASHA certified SLP undergraduate programs provide the foundation for speech and language development and speech and language disorders, but not legal aspects and regulatory requirements, classroom management techniques, service delivery practices, workplace behaviors, or cultural factors <p>The American-Speech-Language-Hearing Association (ASHA) is the governing body that certifies and licenses speech-language pathologists. ASHA has established guidelines for SLPAs. An overview of the guidelines is as follows:</p> <ul style="list-style-type: none"> The supervising ASHA-certified SLP is responsible for the services provided by the SLPA SLPAs do not carry their own caseloads Supervising SLP must be certified by ASHA and licensed by the state (where applicable), practicing at least 2 years following ASHA certification, and completed at least one pre-service course or CEU in supervision (recommended) ASHA states that the minimum amount of supervision should be: 30% weekly/1.5 days (at least 20% direct) for the first 90 workdays and 20% (at least 10% direct) after the initial work period <ul style="list-style-type: none"> -direct supervision is on-site, in-view observation and guidance by SLP while assigned activity is performed by SLPA SLP should supervise no more than 3 SLPAs <p>VDOE has stated that an SLPA must be certified by a nationally (ASHA) certified SLP.</p> <p>FSLCA has concerns regarding Fairfax County’s use of the ASHA license. The SLPs in Fairfax County Public Schools pay for their ASHA licenses. The license costs each ASHA certified SLP \$300 annually. Fairfax County Public Schools does not contribute to the cost of this license. In addition, SLPs licensed by the Commonwealth of Virginia</p>
	Sally B. Martin		
	Dr. Gerianne M. Gilligan CCC-SLP		
	Andi P. Bregtstone	Speech-Language Clinician Woodley Hills Elementary School	
	Nancy J. Landis	Speech-Language Clinician Wooburn Elementary School	
	Molly Minor	Timber Lane Primary School	
	Gail Shapiro, MA, CCC-SLP	Speech-Language Clinician Poe Middle School	
	Davida Shevitz	Speech-Language Pathologist Irving Middle School Whitman Middle School	

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>Board of Audiology and Speech-Language Pathology pay for state licensure, which costs \$75 annually. Fairfax County Public Schools does not contribute to the cost of this license. ASHA approved continuing education units (CEUs) are required to maintain ASHA licensure. ASHA requires that the CEUs be renewed every 3 years. Fairfax County Public Schools covers some, but not all of the expense of the CEUs.</p> <p>Although there has been no discussion regarding the implementation of SLPAs in Fairfax County Public Schools, FSLCA has concerns regarding the manner that SLPAs could possibly be utilized. In Virginia, SLPs are staffed 68 students to one SLP. In Fairfax County Public Schools, SLP positions remain vacant. FSLCA has concerns that Fairfax County Public Schools will use the endorsement of SLPAs to fill the remaining vacancies rather than using effective recruitment and retention strategies to attract highly qualified SLPs. If SLPAs are endorsed, will SLPs have caseload reduction in order to supervise SLPAs appropriately? VDOE has stated that SLPs are responsible for all testing, IEP/goal development, consultation with parents, and attendance of meetings. In order to perform these duties, the SLP must be knowledgeable about all students on caseload. Is it possible to be knowledgeable about all students on a caseload with a SLP supervising a SLPA one day/week (20%)? With the use of SLPAs, how many students will the SLP be responsible for (68 students of his/her own in addition to more students at another site)?</p> <p>Even with the concerns regarding the endorsement of the SLPA, there are benefits to hiring SLPAs. Benefits include more consistent services to students (due to SLPAs limited scope of responsibilities), assistance with paperwork (updating goals in cum files, copying, ponying, etc...), and the allowance of more time to collaborate with teachers (only if the SLP's caseload is reduced). FSLCA recommends the endorsement of SLPAs only under very specific circumstances. The circumstances are as follows:</p> <ul style="list-style-type: none"> • SLPAs should only be used in schools with large caseloads that cannot be covered by the SLP • SLPAs should work in schools with a full-time on-site SLP • SLP caseloads should be reduced to allow for appropriate supervision of SLPA <p>Under other circumstances, FSLCA does not recommend the endorsement of SLPA in the Commonwealth Virginia.</p>

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>Thank you for considering the FSLCA’s position regarding the endorsement of SLPAs.</p>
12/15/2006	Sally B. Martin	Speech/Language Pathologist Fairfax County Public Schools	<p>As a Certified Speech/Language Pathologist working in Fairfax County Public Schools, I am deeply concerned about the suggested VDOE endorsement requirements of speech/language pathology assistants (see requirements in letter attached).</p> <p>Speech/Language Pathologists are leaving the school setting because the caseload demands and expectations are becoming unmanageable. I have worked in hospitals, clinics, and a private practice, and am familiar with the caseload demands of these settings. I fear that by turning to SLPAs to cover the shortage of certified speech/language pathologists, that we may eventually dilute our service delivery system, and further contribute to speech pathologists leaving the schools because of increased supervisory demands. Currently, SLPs are staffed at a 68:1 student/clinician ration. How can a certified SLP realistically provide 500 hours of supervision to SLPAs and manage their current caseload? VDOE has stated that SLPs are responsible for all testing, IEP/goal development, consultation with parents, and attendance of meetings. Yet, in order to perform these duties, the SLP must be knowledgeable about all students on caseload. Is it possible to be knowledgeable about all students on a caseload with a SLP supervising a SLPA one day/week (20%)? With the use of SLPAs, how many students will the SLP be responsible for (68 students of his/her own in addition to more students at another site)?</p> <p>The American-Speech-Language-Hearing Association (ASHA) is the governing body that certifies and licenses speech-language pathologists, and has established guidelines for SLPAs. Wouldn’t it make more sense for the individual to obtain SLPA certification through an ASHA accredited college/university, much like Certified Occupational Therapy Assistants?</p> <p>I am not averse to using SLPAs under specific circumstances, notably, in schools with large caseloads that cannot be covered by a single SLP. An SLPA in the same building as the full-time SLP could be supervised much more easily. However, SLP caseloads would still need to be reduced to allow for appropriate supervision. Under other circumstances, FSLCA does not recommend the endorsement of SLPA in the Commonwealth Virginia.</p> <p>Thank you for considering the FSLCA’s position regarding the endorsement of SLPAs.</p>

Date	Name	Title and Organization	Speech-Language Pathologist Comments
12/15/2006	Martha L. Ruelle, MS, CCC-SLP	Speech-Language Pathologist Fairfax County Public Schools	<p>Regarding the proposed changes to licensure to endorse speech assistance I have the following concerns:</p> <ul style="list-style-type: none"> • undergraduate programs do not offer 500 hours of supervised education experiences • undergraduate programs offer <u>observation</u> of clinical practice, not supervised education experiences such as providing direct services to children or adults under the guidance of an ASHA certified SLP • undergraduate programs provide the foundation for speech and language development and speech and language disorders, but not legal aspects and regulatory requirements, classroom management techniques, service delivery practices, workplace behaviors, or cultural factors <p>I could support endorsement of SLPAs only under very specific circumstances. The circumstances are as follows:</p> <ul style="list-style-type: none"> • SLPAs should only be used in schools with large caseloads that cannot be covered by the SLP • SLPAs should work in schools with a full-time on-site SLP • SLP caseloads should be reduced to allow for appropriate supervision of SLPA <p>Under other circumstances, I not recommend the endorsement of SLPA in the Commonwealth Virginia.</p> <p>Thank you for considering these ideas.</p>
12/15/2006	Dr. Lissa Power-deFur	Chair, Department of Education, Social Work, and Communication Disorders Longwood University	<p>Thank you for the opportunity to comment on these regulations.</p> <p>1. Speech-Language Pathology Assistant.</p> <p>Although developed with the best of intentions to address the shortage of speech-language pathologists in the schools there are a number of problems with this approach:</p> <ul style="list-style-type: none"> • The required number of clinical observation hours far exceeds those offered in a typical undergraduate only program. Inclusion would require a one-semester placement as a speech-language assistant. This would potentially add a semester to the undergraduate program and will definitely increase costs to the university to staff the observation class. It is not likely that universities will assume these

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>additional costs.</p> <ul style="list-style-type: none"> • Without comparable regulation governing the roles and responsibilities of speech-language pathologist assistants, in some places in the state, these persons will be likely to be assigned the work of a masters' level speech-language pathologists. • The establishment of a bachelors' level paraprofessional becomes a rank and salary issue for school districts, when other paraprofessionals are generally high school or associate level personnel. <p>I recommend that this provision be eliminated. In order to address the shortage, continued use of a conditional/provisional license should be used. However, to ensure that these personnel will complete the masters' degree in a timely fashion, this license should only be given to persons who have a bachelors' degree in communication sciences and disorders. In addition, the licensees must demonstrate acceptance into a graduate program within one calendar year of receiving the license. (Currently, graduate programs have experience with conditionally licensed speech-language pathologists who are denied admission to graduate school, yet continue to be employed for the length of the 3 year license.)</p>
12/15/2006	Dr. Carol Dudding	Speech-Language Pathologist	<p>I would like to take the opportunity to provide feedback on the proposed licensure changes in the area of speech language pathology assistants. I am an ASHA certified speech language pathologist who has been working in the state of Virginia for more than 17 years. I am also a faculty member in a graduate degree program in Virginia. I am responding in the capacity of a certified licensed professional and not as a representative of the university program.</p> <p>In reading the proposed changes, I am concerned that:</p> <ol style="list-style-type: none"> 1. Current bachelor's level training programs do not provide clinical education regarding the evaluation and treatment of children school-based speech-language pathologists are serving, such as dysphagia (swallowing disorders), apraxia, autism, traumatic brain injury, etc. I do not see the opportunity for students to gain 500 hours of clinical education as an undergraduate. 2. The proposal did not detail the supervision requirements. What level of supervision and by

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>whom is required? Can the assistant be assigned a caseload?</p> <p>3. The duties and responsibilities of the assistant was not clearly defined. As you know, ASHA has detailed guidelines and expectations regarding use of assistants. I am concerned that an ASHA certified SLP may risk violating ASHA Code of Ethics if these issues are not clearly defined.</p> <p>4. I am unsure as to how slp assistants will be compensated. They will hold a BA or BS degree and yet may be paid in accordance with other paraprofessionals that may or may not have a college degree. I imagine this may be sensitive issue in recruiting and maintaining qualified individuals.</p>
12/7/2006	Kathy Fleming, M.S. CCC-SLP		<p>Twenty years ago, a bachelor’s level speech-language pathologist (slp) working in the schools was fairly common; school based slps most often worked with sounds such as s, r, and l, and with language delays. In 1994, the state of Virginia required slps to have a master’s degree. This was due, in part, to the expanding numbers of children enrolled in special education, and because of the increasingly more complex variety and severity of disabilities slps were being asked to remediate. Virginia appeared to be sincere in its attempt to provide the highest quality of service provider to children in need of the services of a specialist.</p> <p>Today, a growing percentage of school based slps are working with dysphagia, or feeding and swallowing. They also are working with children with multiple disabilities, autism, or traumatic brain injuries who may need an augmentative communication device to communicate. The coursework for these areas is taught at the graduate level, as are most courses dealing with stuttering, voice disorders, and severe language disorders. When Virginia changed its requirement in 1994, it grandfathered those slps currently working with a bachelor’s degree, but required they take 15 hours of graduate coursework in the field of speech-language pathology. The current proposal does not even require that.</p> <p>Virginia has one of the highest caseloads in the country. As a result, a shortage of qualified slps currently exists in most public school divisions; new graduates are not staying away from the schools because of the money; they are staying away because of unethically high caseloads. The state is proposing to license bachelor’s level slps as assistants to help the certified slps with the workload. In reality, what is happening is the slop assistants are providing</p>

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>therapy services. This is not only unethical, but potentially dangerous. As a former public school coordinator, I understand the stress of hiring and retaining qualified slps. I also understand the ethics and liability, and the tenuous position in which certified slps are placed when they are asked to supervise slp assistants. They are being asked to serve a caseload and to supervise the assistants. This is to occur while they have bus duty, make bulletin boards, attend child study and eligibility meetings, write IEP's, evaluate and work with children and serve as consultants to classroom teachers. The answer lies not in lowering the qualifications of the service provider, but lowering the caseloads to a manageable workload to attract and retain certified speech-language pathologists. Thank you for your time.</p>
11/3/2006	Randy L. Jennings, Ed.S., CCC-SLP	Speech-Language Pathologists Wythe County Public Schools	<p>I would like to comment on the Speech-Language Assistant Licensure. At the present the guidelines call for B.S. level education; however, I question whether individuals with B.S. and is a SLPA will be compensated for the B.S. I feel that it would be much wiser to have specially designed programs at the community college level for the SLPA. Those will coincide better with the pay. Teachers are simply required to have a B.S. and will receive much better compensations than a SLPA with the same training.</p> <p>In addition, the SLPA will provide better services given a systematic training, with targeted skills, provided at a specifically designed program at the community college level. Please consider these recommendations carefully.</p>
10/19/2006		State Special Education Advisory Committee (SSEAC)	<p>The SSEAC endorses the proposal to move the Masters Level SLP to Pupil Personnel.</p> <p>The SSEAC endorses the proposal to include in the state licensure endorsement the Speech/Language Assistant (provided they are supervised by a masters level SLP).</p>
12/6/2006	Dr. Alice M. Farling	Assistant Superintendent Fairfax County Public Schools	<p>Fairfax County Public Schools supports the proposed additional of speech-language pathology assistants for preK-12. The speech-language assistant will provide essential support for students while under the direction and supervision of a speech-language pathologist. Due to the high need for additional speech-language pathologists, the new proposed endorsement will help to alleviate speech-language pathologists' workloads.</p>
12/5/2006	Dr. Mike Behrmann	Professor of Special Education at George Mason University	<p>Supports the idea of a speech-language pathology assistant endorsement with the proviso that the assistant be supervised by a master teacher/clinician</p>

Date	Name	Title and Organization	Speech-Language Pathologist Comments
3/21/06	Eileen Abrahamsen	Vice President of Governmental and Professional Affairs, Speech and Hearing Association of Virginia	<p>I am writing to express the grave concerns I, and other members of the Speech, and Hearing Association of Virginia and current graduate students in Speech-Language Pathology, have concerning the proposed endorsement for speech-language pathology assistants (SLPAs) in 8 VAC 20-22-540.</p> <p>While we recognize that there may be some value in establishing such an endorsement, we are requesting that language requiring the supervision of such assistants be included in the bill and that guidelines established by the American Speech-Language Association be followed. Such guidelines are currently in place for those speech-language pathologists serving children in the public schools who are on Medicaid. In addition, it should be made clear in the proposed standards that such assistants are not qualified to carry an independent caseload.</p> <p>I am including copies of letters signed by speech-language pathologists, many of whom have added their personal concerns regarding this proposed endorsement. All are concerned that such lowering of standards will not benefit children with speech and language disorders and are also concerned that this may have an impact on children with speech, language, and other mild disabilities making the Annual Yearly Progress mandated by No Child Left Behind.</p>
3/21/06	Eileen Abrahamsen	Vice President of Governmental and Professional Affairs, Speech and Hearing Association of Virginia	<p>I am also requesting that the title of Speech Language Pathologist (one that our profession has been using for over 30 years) be substituted for the current outdated title Special Education: speech-language disorders preK-12 as the license moves from a Postgraduate Professional License to a Pupil Personnel Services License. All other professionals licensed by Pupil Personnel Services are called by their professional title. This is in regard to 8 VAC 20-22-670.</p> <p>Thank you for listening to our concerns. I hope you will work with us to assure that ALL children in public school systems in Virginia continue to receive quality instruction and support services so that we truly leave No Child Behind.</p>
Undated	Dr. Michael Behrman	Faculty College of Education and Human Development	<p>The faculty of the special education teacher education programs commends the Commonwealth of Virginia for the proposed changes to teacher licensure in the state. We are focusing our comments on issues related to serving children with special needs.</p> <p>The faculty of George Mason University supports the following change to the proposed requirements:</p>

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>Consistent with the proposed changes, we endorse the proposal to move the Masters Level SLP to Pupil Personnel and the proposal to include in the state licensure endorsement the Speech/Language Assistant (<i>provided that they are supervised by a master's level SLP</i>).</p>
11/20/06	Rebekah Sargeant	Student University of Mary Washington	<p>I am a college sophomore who is in the process of completing an application to substitute in a local school system for Winter and Spring Breaks. I learned recently that if I take an additional ten hours of training by the coordinator of Speech Therapy Services in this local school system that I will be able to be a Speech Therapist Substitute.</p> <p>The only requirements to be a substitute are to pass the background check. TB screening and to have a high school diploma. I spoke to my mother who is a speech therapist in this school system about my being a sub. She said that this year she is over the maximum caseload that is suggested by the Virginia Department of Education and has 70 students. She was told that this school system is not going to hire another Speech Pathologist to help out. Instead she has been told that she is to use the SLP Assistant (para) to conduct therapy sessions. She has refused to do this because she believes that the SLP assistants were only meant to help out with filing paperwork and creating materials. However, she is being assigned more students in an effort to get her to use the SLPAs for therapy. My mother is concerned because the SLPAs are classified as paras and not substitutes. When she is absent, she is told that she is to turn over her lesson plans to the SLPA. However, my mother feels doing so is a violation of school board policy because if she is not in the therapy room for supervision, then she has left her classroom in charge of a para which no classroom teacher is permitted to do. When any other SLP is out and has access to a SLP para, she uses the para (who is not paid the higher substitute teacher pay) for makeup sessions. My mother has also been told that she is to write in as service provider for speech therapy: Speech Pathologist/SLP Para so that either staff member can deliver speech therapy. We have had many discussions on how frustrating it is to work under such conditions.</p> <p>I was wondering how this is permitted. Don't you have some sort of regulatory board to protect consumers from untrained staff? I was also thinking that this practice also denies a licensed Speech Pathologist the opportunity to practice because s/he is no longer needed to fill in for e.g. extended SLP leaves, such as maternity. Wouldn't it be protecting</p>

Date	Name	Title and Organization	Speech-Language Pathologist Comments
			<p>the profession to object to this questionable practice?</p> <p>O was thinking of a career in speech pathology but it doesn't seem that there is much regulation in this profession if all one needs is a high school diploma, a TB screen, background check and ten extra hours of training. On the other hand, it appears that the professions of Physical Therapy and Occupational Therapy have consumer safeguards in place because of the regulations governing the practice of these disciplines. Why does your board even exist?</p>
	<p>Pamela Hudson Baker, Ed.D.</p> <p>Michael M. Behrman, Ed.D.</p> <p>Helen A. Kellar</p> <p>Frederick Brigham, Ph.D.</p> <p>M. Susan Burns, Ph.D.</p> <p>Judith Fontana, Ph.D.</p> <p>Annie Fulcher, M.Ed.</p> <p>Joseph C. Gagnon, Ph.D.</p> <p>Mark B. Goor, Ph.D.</p> <p>Lori Jackman, Ph.D.</p> <p>Marci Kinas-Jerome M.Ed.</p> <p>Margaret King-Sears, Ph.D.</p> <p>Margo A. Mastropiero, Ph.D.</p>	<p>Assistant Professor of Education: ED/LD</p> <p>Coordinator</p> <p>Professor of Special Education: SD, AT, Special Education</p> <p>Associate Professor of Education: ED/LD</p> <p>Associate Professor of Education, ECSE, Undergraduate Advisor in ECSE & SD</p> <p>Assistant Professor, TTAC, ED/LD</p> <p>Special Education Advisor</p> <p>Assistant Professor of Education: ED/LD</p> <p>Professor of Education: ED/LD</p> <p>Assistant Professor of Education: ED/LD</p> <p>Instructor SD/AT</p> <p>Professor of Education: ED/LD</p> <p>Professor of Education:</p>	<p>Consistent with the proposed changes, we endorse the proposal to move the Masters Level SLP to Pupil Personnel and the proposal to include in the state licensure endorsement, the Speech-Language Assistant (<i>provided they are supervised by a Masters Level SLP</i>).</p>

Date	Name	Title and Organization	Speech-Language Pathologist Comments
	Nikki Miller, Ed.D. Jane A. Razeghi, Ed.D. Carmen Rioux- Bailey, Ed. S. Thomas E. Scruggs, Ph.D. Terry Werner, J.D.	ED, LD, MR Assistant Professor: TTAC, ED/LD Associate Professor of Education: ED, LD, MR Instructor: ED, LD, MR Professor of Education: ED, LD, MR, Director Ph.D. in Education Program Coordinator of Special Education Outreach Programs	

Changes in Endorsement Requirements for History and Social Studies

Date	Name	Title and Organization	Changes in Endorsement Requirements for History and Social Studies
12/5/2006	Honorable James H. Dillard II	Fairfax County Citizen	<ul style="list-style-type: none"> • Brought greetings from Commission in Civics Education • In terms of the requirements for an endorsement in history and social science, he was opposed to the lowering of hours in political science from 18 to 12 and the number of hours in geography from 9 to 6 • In light of NCLB, it is not the right time to cut back on requirements—it sends the wrong message about Virginia’s support for highly qualified teachers

Date	Name	Title and Organization	Changes in Endorsement Requirements for History and Social Studies
			<ul style="list-style-type: none"> • We need teachers who are well prepared in geography and political science • He also supports keeping the course in foundations of education in the professional studies requirements since it relates to social science and civics education.
12/7/2006	Donald Zeigler	Professor of Geography Old Dominion University	<p>My name is Donald Zeigler. I am professor of Geography at Old Dominion University in Virginia Beach. I am also a founding member of the Virginia Geographic Alliance and a past president of the National Council for Geographic Education.</p> <p>I am here because I am concerned that the high standards which Virginia has set for licensing its social studies teachers may be diluted. My comments are pertinent to the Licensure of School Personnel 8VAC20-22—380, which proposes that the number of credits in geography needed for licensure be reduced from 9 credit hours to 6 credit hours. Please don't approve this reduction in licensure requirements. Geography is critical to the globalizing world in which we live, and it commands a major part of the secondary curriculum. Note the titles of the four state-recommended courses for grades 8-12:</p> <p>World History and Geography to 1500 A.D. World History and Geography: 1500 A.D. to present World Geography Virginia and United States History Virginia and United States Government</p> <p>History appears in three of those titles; so does geography. We need well-trained teachers for these courses and that means training in geography.</p> <p>Because of distance learning capabilities, geography courses are more widely available than ever before. In my own area, Tidewater Community College and Regent University both offer online geography courses which are available to teachers across the state. At Old Dominion University, I have developed two graduate, SOL-oriented, CD-ROM/online courses, with state funding, and I am working on a third. One of these courses is offered every semester as a distance learning course. Every teacher in Virginia has access to nine credits in geography given these courses alone.</p> <p>The state needs to affirm that geography, with all of its new geospatial technologies, is a priority of instruction. It offers a forum for teaching about the contemporary world and the global environment. And, the state has just put a Geographic Information System software package called ARCView in every high school in the state. We have been moving the right direction; let's not reverse course.</p>
11/29/2006	Dr. Michael David	Department of Teaching and Learning School of Education Virginia Commonwealth University	<p><i>Item #380—Proposal to reduce the number of hours in geography from nine to six hours for an endorsement in social studies.</i></p> <p>VCU faculty oppose this proposal. Given the current context in Virginia and the nation, the state should be expanding teachers' knowledge in teaching geography, not reducing it. Geography is a major emphasis on the Virginia Standards of Learning. In addition, Virginia students will be competing in an increasingly global economy and affected by international events. Therefore, there seems to be no sound reason to reduce the amount of coursework that prospective social studies teachers need in this critical area.</p>

Date	Name	Title and Organization	Changes in Endorsement Requirements for History and Social Studies
12/14/2006	Alice Reilly	Coordinator , K-12 Social Studies Fairfax County Public Schools	<p>My name is Alice Reilly and I am the social studies coordinator for Fairfax County Public Schools. I am also an adjunct professor in the Graduate School of Education at George Mason University. It is from these perspectives that I offer comments in reference to the proposed changes to the teacher licensure under 8VAC20-22-380.</p> <p>As the social studies coordinator for my system, my responsibilities include visiting classrooms to observe instruction as well as provide professional development and resources related to social studies for our teachers. Based upon those experiences, teachers are asking for more content background knowledge, not less. Data collected from an intensive professional development program in American history called the Teaching American History Grant showed that teacher participants felt more confident in their classroom instruction and encouraged student discussions and questions as a result of this increased content knowledge.</p> <p>When SOL data is disaggregated and analyzed by schools, many schools express a need to include more geography in their instruction. This geography needs to include more than just “pick the location on a map” which is frequently the case. Students can easily do that but most often do not get instruction about the influence of geography on various events and cultures that are being studied. They miss important conceptual understandings as a result of teachers not prepared to include it in their instruction. As a social studies professional, I know that geography plays an important part of history. Think of the Crusades, the Silk Road, the explorers, westward expansion, and the rise of the United States as a world power as a result of the Spanish American War. The five themes of geography are key to the study of these events and teachers need to be able to articulate those in a meaningful way to students.</p> <p>Recently the General Assembly of the Commonwealth of Virginia established a Commission on Civic Education whose focus is to increase instruction in government and citizen participation in our schools. Decreasing the number of hours required in political science by teachers would appear to be in direct conflict with that goal. Once again, teachers need to have a firm background in this area if they are to provide meaningful instruction.</p> <p>Assuming that prospective teachers will receive sufficient background knowledge in the myriad components of social science in their college history courses is naive. As with any coursework, it depends upon the professors, their method of teaching and their philosophy of history. One certainly cannot assume that every prospective teacher in Virginia will receive sufficient background knowledge in geography and political science by reducing the number of content hours required. While the reduction in the number of content hours would bring social studies more in line with other content areas, a license in secondary social studies is unique. Other content areas such as science, endorse teachers for a specific course such as Biology or Chemistry, not a general secondary science. With a secondary social science endorsement, teachers could be assigned to any one or combination of a number of social science courses offered. In Fairfax County Public Schools, we offer 11 electives in social studies besides the required SOL courses. If teachers are to be successful in higher level courses such as AP or</p>

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			<p>IB, they must have a very strong background in that content. AP government is one of the largest enrolled AP courses in our system.</p> <p>Finally, as a professor of secondary social studies methods at George Mason University, I have had “Career Switcher’ students in my classes. These students are given credit for content courses they have taken in the past which often is as an undergraduate and could have been taken as long as 20 years ago. As it stands right now, many of these individuals are unprepared because of insufficient content background which may not be current. The proposed changes would further exacerbate this problem by providing credit for “life experience”. Historiography continues to change as more primary documents are discovered and analyzed by historians. Prospective teachers need to know both the content and the pedagogy and reducing the requirement for content puts an added strain on these alternative licensure candidates.</p> <p>The propose changes are ill-advised not only because of the issues previously stated but also because of the increased globalization and interdependence of many cultures. In fact, the Fairfax County School Board has recently passed a strategic goal that calls for increased global awareness by our students. Where will the teachers of tomorrow get this information without sufficient content knowledge?</p>
12/15/2006	Vince Indelicato		<p>With regards to 8 VAC20-22-380, I am not in favor of these changes for several reasons. First, while 51 semester hours in History and Social Sciences may be seen to be excessive under the current regulations, I believe that the cut to semester 42 hours is a cut too far. Second, if a change needs to be made in the distribution of coursework, I believe that a better change would be to drop the History requirement down to 15 semester hours, drop the Political Science requirements to 15 semester hours, and keep the Geography and Economics requirements at their current levels of nine and six semester hours respectively. This would bring the total required semester hours down to a more manageable 45 and provide an even distribution among the disciplines.</p> <p>In addition, the add-on endorsement requirements under 8VAC20-22-380.B. need to be looked at as they are too severe given the proposed reduction in semester hours. I would encourage the state to look at either removing the possibility for add-on endorsements in the social studies areas or open the add-on endorsements up to non-history/social studies endorsement holders. It does not make sense for a current holder of a social science endorsement to look at completing the add-on requirements when the requirements to get the full History and Social Sciences endorsement is not many more semester hours in general, and is in fact less in the areas of geography or economics. The add-on endorsement level of 21 semester hours only makes sense for a non-social science endorsee, and thus, the state should consider removing 8VAC20-22-830.B.1. and treating the add-on endorsements in this area like the Algebra I or Journalism add-on endorsement, which is open to all endorsement holders with a bachelor’s degree.</p>
12/7/2006	Dr, Brennan M. Kraxberger,	Assistant Professor Department of Government and Public Affairs Christopher Newport	<p>I am Brennan Kraxberger, Assistant professor at Christopher Newport University (CNU). At CNU, I teach geography and political science courses that support our teacher education program.</p> <p>I would like to address the proposed revisions to <i>Regulations Governing the</i></p>

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		University	<p><i>Licensure of School Personnel</i> (8 VAC20-22-10 et seq.). Specifically I speak tonight in opposition to elements of the proposed requirements for secondary level licensure in History and social sciences (p. 42, 8 VAC-20-22-380). Given the breadth of learning required to successfully teach history and social sciences, I do not believe it is prudent to reduce the number of content area hours required for this endorsement from 51 semester hours to 42 hours (pg. 42, section A-2). I am particularly troubled that the proposed reduction of 9 credit hours would come from the two critical disciplines of geography (3 hours) and political science (6 hours). I will use the balance of my time to argue for more, not less, geography in our public schools, and in teacher training curricula in Virginia.</p> <p>Why is it important to retain the current requirement for 9 hours of geography coursework? Kids will need to understand their world in order to compete for jobs in an increasingly global economy, to help the United States meet international challenges from terrorism to avian flu, and simply to enjoy our diverse planet. Geography provides an essential spatial framework, as well as new technologies like geographic information systems (GIS), for understanding our world. More than just maps, geography addresses connections between people, places, cultures and environments. It is an essential complement to the study of history, civics, and economics. But sadly, our kids do not get enough geography. A major national survey commissioned by National Geographic, and released in early 2006 (http://www.nationalgeographic.com/roper2006/findings.html), confirmed what past surveys have revealed. These surveys show that young Americans do poorly on even basic geography skills. Following are excerpts from the summary of the National Geographic survey:</p> <p>“Americans are far from alone in the world, but from the perspective of many young Americans, we might as well be. Most young adults between the ages of 18 and 24 demonstrate a limited understanding of the world, and they place insufficient importance on the basic geographic skills that might enhance their knowledge.</p> <p>Young Americans answer about half (54 percent) of all the survey questions correctly. But by and large, majorities of young adults fail at a range of questions testing their basic geographic literacy.</p> <ul style="list-style-type: none"> • Only 37% of young Americans can find Iraq on a map—though U.S. troops have been there since 2003... • 20% of young Americans think Sudan is in Asia. (It’s the largest country in Africa.) • 48% of young Americans believe the majority population in India is Muslim. (It’s Hindu-by a landslide.) • Half of young Americans can’t find New York on a map. <p>These results suggest that young people in the United States – the most recent graduates of our educational system – are unprepared for an increasingly global future. Far too many lack even the most basic skills for navigating the international economy or understanding the relationships among people and places that provide critical context for world events.”</p> <p>Such results suggest that geography should be given more, not less, emphasis</p>

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			<p>in our schools, as is done in most industrialized countries. Yes, our students should be required to take more geography in schools. Equally important, however, is the preparation of educators. It is unreasonable to expect better student performance outcomes without sufficient emphasis on geography training for future teachers. It is therefore unwise to lower the minimum geography requirement for secondary endorsement in History and social sciences.</p>
12/6/2006	David Hicks	Faculty History and Social Science Teacher Education Virginia Tech	<p>My name is David Hicks, History and Social Science Teacher Education at VT. I run a graduate level History and Social Science teacher preparation program. My comments are directed to the <u>Licensure of School Personnel</u> 8 VAC 20-22-380. My major concern is the proposed reduction in the content hours required for history and Social Sciences 6-12 licensure. My program is a 5th year program-where candidates are expected to gain solid content knowledge related to history and social science at the undergraduate level and then develop their abilities to take this content knowledge and make it teachable to children (pedagogical content knowledge) at the graduate level. Currently at VT – which has a state and nationally accredited program, candidates for licensure must have at a minimum a Bachelors degree in a social science field (the majority of my students are either history or political science) with an additional 51 hour (sic) of content distributed in the following disciplines: History 18 hours; Political Science 18 hours (considered a minor at VT), 9 hours of Geog and 6 hours of Economics. I feel strongly that accruing such a disciplinary content knowledge provides prospective teachers with a fair knowledge base from which they can then be prepared to organize, implement and assess instruction in line with the Virginia 6-12 history and social science Standards of Learning. The current requirements set by the state are appropriate and recognized as quite strenuous when compared to other states—That (sic) is a good thing for Virginia’s schools and children.</p> <p>We live in an era that emphasizes the importance of (1) rigorous and demanding state standards, (2) accountability for students and teachers; and (3) preparing highly qualified teachers who are prepared to educate all children. That is a good thing for Virginia’s School (sic) and children.</p> <p>Preparing teachers for the challenges of educating 21st century citizens is a big job. To be successful in this task teachers need to have both high levels of content knowledge and pedagogical content knowledge. Nurturing and developing such complex knowledge systems is challenging yet vital if we are to have a cohort of teachers who have the knowledge, skills and critical dispositions to successfully educate tomorrow’s global citizen. With this in mind I am a little perplexed and concerned that the new licensure regulations are advocating reducing the current 51 hours of social science courses to 42 hours. Though history remains at 18 hours and economics remains at 6, the proposed reductions in political science course hours from 18 to 12, and geography course hours from 9 to 6 contradicts the general political overtures for securing highly qualified teachers who will strive to educate all children.</p> <p>Currently the Virginia SOL in history and social science are held in high regard by many educational think tanks. The Fordham foundation recent publication <i>The State of the State Standards 2006</i> http://www.edexcellence.net/foundation/publication/publications.cfm?id=358 gave the World history and geography standards an A and the US history</p>

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			<p>standards a B.</p> <p>While it is good for Virginia’s schools and children that we have strong standards, it is important that we have knowledgeable teaches (sic) who are ready, willing, and able to teach these standards. Reducing the content requirements at a time when (1) we consistently see prospective teachers struggle to be successful on the praxis II social studies content test, (2) each year my cohort of the best and brightest history and social science graduates still panic that they do not have enough content knowledge to teach the SOL (I am lucky to be a (sic) VT. I have top-notch students and I have the luxury of picking the best and the brightest), and (3) National reports such as the Roper report http://www.nationalgeographic.com/roper2006/ reveal an astounding level of geographic illiteracy amongst young adults ages 18-24; It (sic) just does not make sense to require less academic content preparation to be a history and social science teacher in the licensure requirements.</p> <p>Without trying to sound pedantic-the teacher of history and social science (social studies) does not have a good reputation in schools. It has often been the discipline where schools hide their coaches until the football or basketball season. Social studies teachers were coaches’ first-teachers maybe third. Lessons were pulled directly from the textbook by individuals who themselves where (sic) learning the subject it appeared for the first time, and in general were just a night ahead of their children. The power and relevance of history and social science was lost on students because their teachers were ill prepared and lacked a strong content knowledge base, and as a result were incapable of taking history and social science content and making it powerful meaningful and teachable to students. I thought the tide in Virginia with regard to recognizing the importance of preparing cohorts of knowledgeable highly qualified history and social science teachers was changing in the right direction. I feel that the new licensure requirement that de-emphasis (sic) both the learning of content as well as the foundational educational course that help prospective teachers begin to understand that it means to be an educator of all children puts us on a path toward declining standards and weak ill prepared teachers of future citizens. Something that is ultimately economically, socially and politically unsound and not good for Virginia’s schools and children</p>
12/5/2006	Martha Smith	Teacher Roanoke County Public Schools	<p>I am Martha Smith, a teacher in Roanoke County Schools for 25 years. For most of those years I have taught World Geography. I am also coordinator of the Southwest Region of the Virginia Geographic Alliance. I was distressed to learn of the proposal (8 VAC 20-22-380) to reduce the current 51 credit hours for licensure in History and Social Sciences to 42, especially change the 9 hours requirement in geography to 6 hours. I would advocate increasing the hour requirement.</p> <p>When I received my teaching license (years ago) in History and Social Studies, hours in geography were not required. I had no geography classes in college, but I was “a qualified teacher”. When I found myself teaching World Geography, I felt very overwhelmed. Fortunately, I had the help and support of other teachers; without that I would not have lasted in the classroom. I took geography classes and worked very hard to acquire knowledge in geography. It is not an easy subject to teach; 9 hours credit is certainly a minimum for pre-teachers; reducing the number to 6 would severely hinder the content knowledge of first-year teachers and add to the</p>

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			<p>stress of the first teaching job. We want to try to keep teachers in the profession – not add discouraging factors; feeling inadequate in terms of content would definitely be discouraging for new teachers.</p> <p>I have worked closely with several young teachers in the past few years who had the 9 hours in geography, but felt that they could certainly have used more credits to better prepare them for teaching the subject. Since geography is the “Mother of All History,” geography knowledge is essential to teach all social studies, especially U.S. and World History.</p> <p>If teachers are unprepared, we should not be surprised at Roper Polls that show how poorly U.S. 18-24 year olds do on basic geography questions. In an interdependent and global world, highly qualified geography teachers are essential. Having a 9-hour (or greater) geography requirement for licensure in History and Social Sciences helps meet that goal.</p>
12/5/2006	Dan B. Fleming	Professor Emeritus of Social Studies Education Virginia Tech	<p>ABTEL is reportedly considering changes in the certification of secondary history and social science teachers in Virginia. It is untimely to make such changes since the Department of Education will soon revisit the Standards of learning for history and the social sciences. Revisions in these SOLs could impact what is needed in teacher certification. For example, there is an organized move underway to give greater emphasis to civics and government in the curriculum. This suggests the need for greater preparation in the area of political science.</p> <p>Is ABTEL considering reducing the number of hours required for the secondary history and social sciences certification that now consists of 51 semester hours in history, political science, geography and economics? If so, it is puzzling why such a change is being considered in light of the national focus on upgrading public education. For Virginia’s 37 teacher education approved programs, this does not seem to be a problem, so what is the problem?</p> <p>The general history and social science certification was intended to allow teachers to teach more subjects with very weak preparation in geography and solve staffing problems. If we want qualified teachers, we should be strengthening teacher requirements, not lowering them.</p> <p>A particularly significant subject for the 21st century is geography. In the highly acclaimed book by Tom Friedman, <i>The World Is Flat: A Brief History of the 21st Century</i>, Friedman declares that the world of tomorrow will be one of globalization and interdependence. Only those nations with the best educational system producing critical thinkers and an understanding of this changing world will succeed. Geography more than any other social science prepares students for this new age of globalization. Therefore I recommend that you increase the hours required for geography from nine hours to eighteen. Under history, you also should require at least six hours in non-western history or culture. I also recommend that for political science certification, a course in American government be required.</p> <p>These additions total 60 semester hours, indeed a large number. Perhaps that time has come to eliminate the general certification for high school history and social science teachers and go to a major-minor only approach. For example, a teacher would be certified with 30 SH in history and in those</p>

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			<p>other fields where you have taken at least 18 hours. Do not lower the quality of Virginia teachers by weakening their already inadequate content requirements for geography and political science.</p>
Undated	Dr. James L. Sellers,	Former Teacher/Administrator	<p>I've spent a career involved in education. As a former high school social studies teacher, central office social studies supervisor, elementary principal, middle school principal, assistant superintendent for instruction, interim school superintendent, and college professor, I've worked to strengthen education. I write here about concerns that I see with the proposed revision in social studies teacher licensure in Virginia.</p> <p>I know that it's difficult for some school divisions to always employ licensed teachers. For the most part, social studies teachers have not been overly difficult to employ. With that in mind, it's difficult for me to perceive that easing licensure requirements for social studies teachers would facilitate more teacher candidates applying for social studies teaching positions. Moreover, with less coursework in the social studies, I would not perceive that new teachers would be as qualified to teach in this content area. What then would be the rationale for lessening these teacher requirements?</p> <p>The teaching of the social studies involves a complex interplay between history, political science, geography, economics, sociology, psychology, and anthropology. It takes an understanding of all of these disciplines to balance an appropriate k-12 social studies classroom program. Currently, the Virginia Department of Education requires college course work in history, political science, geography, and economics to qualify one to be licensed to teach in the social studies. To leave geography and economics course work from this required college program of studies for licensure, as proposed, would surely weaken teacher education in the social studies. Moreover, I don't believe it would facilitate more college students majoring in social studies education or the employment of more social studies educators.</p> <p>Just as competency in the teaching of English/language arts requires a balance of reading (literature), writing, listening, speaking, and spelling; AND competency in mathematics education requires a balance of computation, patterning, algebra, geometry, trigonometry, and calculus, social studies education must be balanced in its approach. To remove geography and economics requirements from a college program of study for social studies majors would be tantamount to leaving writing and spelling from English/language arts requirements. The proposal is just not sound educationally, and potential benefits from it appear to be negligible.</p> <p>Please reconsider the proposal to change social studies education requirements. If an appropriate social studies education prepares students for productive living in a local, national, and international setting, then it must help students to understand and appreciate where we've been as a people in both time and place, along with accepting diverse thinking, living, believing, earning, and governing as strengths rather than liabilities. A balanced social studies experience for both prospective teachers and for students K-12 is one way to promote that kind of thinking. That's what I would want for my children and my classroom students.</p>
Undated	Mrs. Theresa LaRocco	President Virginia Consortium of Social Studies	<p>I represent the Virginia Consortium of Social Studies Specialists and College Educators, a group comprised of Social Studies specialists, supervisors, coordinators, and college educators responsible for educating Virginia's</p>

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		Specialists and College Educators (VCSSSCE)	<p>teachers.</p> <p>I would like to specially address what I feel are inconsistencies with proposed revisions to the <i>Virginia Licensure Regulations for School Personnel</i>, section 8 VAC 20-21-290 History and Social Science (p.44).</p> <p>This sectional change would, in essence, reduce the number of hours required by college education programs for the initial certification of teaching personnel in the area of History and Social Science. Current regulations call for 51 total hours of course work to be divided in the following manner:</p> <ul style="list-style-type: none"> • History: either a major in history or 18 semester hours coursework • Political Science: a major in political science or 18 hours in Political Science • Geography: 9 semester hours • Economics: 6 semester hours <p>Proposed changes call for the following:</p> <ul style="list-style-type: none"> • History: a major in history or 18 semester hours in history • Political Science: 12 semester hours in political science • Geography: 6 semester hours • Economics: 6 semester hours <p>A reduction in coursework requirements of nine hours does not seem in keeping with the stringent requirements which are being placed upon our schools and their administrations by the No Child Left Behind Act (which will be revisited in 2007 by the U.S. Congress), nor is it in keeping with the rigid standards established by the Virginia Standards of learning. (History & Social Science 1995, 2001) School divisions across the Commonwealth are working diligently to provide the best education possible to our students, but reducing requirements in content course for teachers will only diminish their ability to impart the best educational information and methods to their students.</p> <p>Having just returned from the National Social Studies Conference in Washington, D.C., it was quite edifying to hear professionals from other states praise Virginia for their richness of content and their success at delivery of this content to the students. And hearing of their problems and issues with content and delivery of their content, I felt very fortunate to be exactly where I am – in Virginia!</p> <p>But to continue with this successful program, we need to “stay the course” in terms of the requirements needed for an individual to be licensed to teach. As a Social Studies coordinator in the City of Salem. (sic) I work with teachers daily who are dedicated to their profession and to the commitment of providing the best instruction possible for our children. To help them to do that, I have helped to provide access to a Teaching American History grant from the U.S. Department of Education. Teachers are thirsting for more content information, not less! They have all taken the necessary steps to become certified in the Commonwealth, but many feel that they are not qualified to teach the standards established by the SOLS without additional coursework.</p> <p>Virginia Standards of Learning in History & Social Science require historic,</p>

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			<p>civic, geographic, and economic skills and information. All are highly specific areas of content expertise. Think about it...how many people can explain the various types of economic resources with any accuracy? The average third grade can because they have learned in the first three years of their educational experience about these resources. Where in the world is South Korea or Iraq or Mali? These are examples of the importance of forming the basis of geographic information for our young people. If we are to be a globally interdependent society, we must equip our students with these skills and information. But our teachers must have the necessary equipment first!</p> <p>Teachers without content knowledge struggle to deliver proper information and skills to their students. While they work hard to do so, one has to wonder what they will miss because of lack of content development.</p> <p>As a teacher, I have grown more comfortable in my classroom as I have gained additional knowledge. When I have been assigned to teacher subject that I have less training in, the results are mixed. It is an uncomfortable feeling to be thrown into a classroom situation without proper training. Would we ask someone to perform surgery on a patient while they were still acquiring their medical school training? They might have some hours, and seen the procedure done, but seeing it and doing it with an adequate amount of training and knowledge are two very different things!</p> <p>Education in the twenty-first century is very different from the initial experience of many educators in this room. Teacher (sic) are being asked to do more with our students, teach more to our students and are being held more accountable than ever. It would be unforgivable to place a teacher in a classroom with less than adequate training in their content area.</p> <p>The federal government as well as the state government is continually adding the “little extras” to the teacher’s place. With the additional of so many extras, they have difficulty keeping up with what they need to be qualified. In just the past year, the General Assembly has legislated to include the development of a new Civics commission for the Commonwealth to help educators strengthen the level of content delivered to students. If we need to strengthen content according to the members of the legislature, we don’t need to eliminate course content hours. The opposite would be true!</p> <p>The additional of a personal finance course for all Virginia students has also pointed attention at the need for additional content hours in economics for personnel assigned to this area. There has been no mention of additional content coursework in Economics.</p> <p>We live in a global world in every way. In Social Studies, we offer our students the world from every perspective! We need to be able to do so with confidence and conviction. Removing course requirements in the area of History and Social Studies is not going to enable the teachers of the Commonwealth of Virginia, but will detract from the effective job that they wish to provide for all students in Virginia.</p> <p>Education teachers are educated adequately in all discipline areas of the Social Studies – History, Political Science, Geography, and Economics.</p>

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			Please vote to maintain the current licensure requirements for History and the Social Sciences.
11/26/2006	Dr. Joseph Eney	Professor Emeritus of Geography, JMU and Co-coordinator of the Virginia Geographic Alliance	<p>My name is Dr. Joseph Eney, Professor Emeritus of Geography JMU and Co-coordinator of the Virginia Geographic Alliance</p> <p>The Virginia Geographic Alliance (VGA) is a 501 (C3), Not for Profit, with the mission of “improving the teaching and learning of geography in the schools of Virginia”.</p> <p>Established in 1987 with National Geographic Society help, endowed with National Geographic Society funds and funds from the legislature in 2000, we have worked since to advance the mission.</p> <p>The majority of my comments are directed to the <u>Licensure of School Personnel</u> 8 VAC 20-22-380. There I find the History and Social Sciences hours required for licensure reduced from 51 to 42. The current 51 credit hrs requirements distributed between (History(18), political science (18 proposed to be reduced to 12), geography (9 proposed to be reduced to 6) and economics (stays at 6)) qualifies/licenses one to teach in these disciplines but also psychology and sociology. Reducing that number from 51 to 42 seems to be going the wrong way.</p> <p>Why do I say the wrong way?</p> <ul style="list-style-type: none"> • From a national perspective: Roper polls conducted in 2002 and 2006 support what James B. Hunt writes in “A New World View: Preparing Our Students for Work and Citizenship in a Global Age”. “...one of most significant but least acknowledged challenges of our time; the enormous gap between the increasing importance of other world regions to our nation’s economic prosperity and national security and our students’ rudimentary knowledge of the 90% of the world outside our borders.” From the sample focus group of 18-24 year olds an example: Over 90% could ID the US on a world map but only 35% could ID America’s ally Great Britain correctly. • Summit participants “International Education in Virginia” Summit in May, ’06 heard speakers, suggest that ‘we are in a race and don’t know it” (sic) The Roper Poll statistics seem to confirm this—don’t they? • From an informal poll of Social Science educators at our colleges and universities, I’m told that scores on the Praxis II History and Social Science exam are low and the lowest are Economics and Geography. The above mentioned cuts will continue the slide—maybe to political science also. • My undergraduate minor in Geography did not prepare me for the first position as a secondary geography teacher. It took about five years of hard work, further course work, etc. Yes, five years, the most critical in terms of staying with teaching or finding something else. That is the time frame in which we lose most of our new teachers, isn’t it? • With my work in the VGA I’ve been involved with K-12 teachers for about 20 years conducting summer institutes of 1-3 weeks, leading summer travel study courses, conducting in-service workshops, etc (sic) I consistently hear teachers asking for more content, more/better understandings of processes such as migration,

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			<p>landform changes, etc. They recognize what will do them the most good.</p> <ul style="list-style-type: none"> • Dr. Don Zeigler of ODU has developed with DOE support an internet and CD Rom based two course titled “World Geography Connects: To 1500” and a second “World Geography Connect: 1500 to Present”. “The purpose of the course is to help teachers incorporate more geography into the world history and geography curriculum.” WHY? Because both the DOE and teachers recognize that they have too little geography in their background to do an adequate job. The course(s) have been offered 15 times since 2001 and have had enrollments ranging from a low of 50 to a high of 120. The majority are WORLD HISTORY AND GEOGRAPHY TEACHERS and who have come through the licensing requirements currently in force. Obviously not enough geography to meet the SOL’s they must attempt to satisfy. <p>IN CONCLUSION, I repeat, these reductions are going the wrong way. In addition, the VGA would have expected greater consultation with your own Staff here, professional organizations, division social studies coordinators.(sic) etc. before modifying the pre service requirements so drastically.</p> <p>The latter group is on the front lines trying to meet the requirements of SOL’s, NCLB etc. They (sic) their social studies teachers and their needs.</p> <p>These final comments are directed to the other hearing being conducted here today and that the REGULATIONS GOVERNING THE REVIEW AND APPROVAL OF EDUCATION PROGRAM S IN VIRGINIA. This relates to the 37 institutions of higher learning in the state that have licensed education programs. Do you realize that part one(1) of this same section referenced earlier (above) will continue an open gate policy or is it a turning the head policy or maybe whose in charge? Graduates from some of our Licensed college and university programs in History and Social science can exit with as few as one course in economics or one course in geography none in Sociology, or Psychology and be “qualified” and licensed to teach those subject areas. I wouldn’t be very comfortable in a secondary classroom with one or even three classes in a discipline.</p> <p>Sorry to say this so publicly, but the VGA suggests an in depth examination of the changes being proposed as well as an examination of how a teaching area such as History and Social Sciences (History, Pol Sci, Geography, Economics, Sociology, Psychology) can become licensed and fail to match the rigor of the section above that proposes to reduce the required hours from 51 to 42.</p>
Undated	Joseph D. Eney	Professor Emeritus of Geography, Co-coordinator Virginia Geographic Alliance and Geographical Society	<p>I am writing directly to you about the proposed revisions to the <u>Regulations Governing the Licensure of School Personnel</u> and specifically 8VAC20-22-380 History and Social Sciences. I and many others responded to the numerical reduction of semester hours of geography and political science under A.2 of the above section. The rationale for such reductions has never been stated, however, the reasons for maintaining the present discipline and semester hour requirements are strong.</p> <p>The three minute limit for comments at the hearings held by the Board left</p>

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			<p>little time for stating other concerns. One concern that surfaced while preparing comments on the above referenced reductions and made briefly at the Richmond hearing (11/29) is related to A.1. which states “Graduated from an approved teacher preparation program in history and social science; or “. A sampling of such programs via college and university internet sites suggests that the Board of Education licensed programs vary in terms of semester hour requirements and mix of social studies. If licensure is designed to insure that we have “highly qualified” teachers in our classrooms that support of the Standards of Learning (SOL) it is this organizations opinion that there be a tighter (sic)</p> <p>Virginia’s Standards of Learning have received recognition by national educators and education groups. The high stakes testing of the content rich history, geography, political science (civics), etc (sic) places the burden on the teacher and ultimately the student. The licensing of programs in history and social sciences, as in part A.1., at universities that cannot or won’t require at least the minimum number of semester hours (51) and subject areas listed in part 2 of the current section of the REGULATIONS seems to be imposing a terrible shortcoming on those future teachers. Reducing the number of semester hours from 51 to 42 adds to an already minimal number of hours in geography and economics. We urge the Board and the Departments licensing office to look closely at the process and standards used to license education programs. As it reads and where it appears in the <u>REGULATIONS...</u> (i.e. A.1), one is led to believe that the programs guarantee a better background in the social sciences than the current 51 semester hours of credit. After examining a few of the licensed programs, we strongly disagree.</p>
11/29/2006	Dr. Robert W. Morrill	Professor Emeritus of Geography, Virginia Tech and Co-coordinator, Virginia Geographic Alliance	<p>The Virginia Standards of Learning require geographic knowledge, skills and perspectives from kindergarten through high school. Teachers need to know geography if they are expected to teach it.</p> <p>Recent Roper polls reveal an alarming lack of geographic knowledge among American students and young adults. Teachers with good backgrounds in geography can help remedy the problem of geographic illiteracy.</p> <p>Understanding Virginia history, United States history and World history requires a foundation in geographic ideas and facts. Teachers need to know how to relate geography and history.</p> <p>We live in a world of global to local interconnections. Events near and far cannot be understood without knowledge of places and how they relate to each other. Global economic activities affect our daily lives. Many of the products we use come from other countries. We need to know how our economy relates to other countries.</p> <p>Environmental changes are affecting us and other people all over the world. We need to understand how the global ecosystem is changing and how those changes influence our lives. Geography courses teach about environment changes and their consequences on human communities.</p> <p>Employment opportunities are rapidly expanding in fields that use geography for information gathering and decision-making. Technologies related to measuring changes on Earth’s surface are growing and there are not enough</p>

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			<p>trained people to fill the jobs available that use geographic information systems, remote sensing and navigation tools.</p> <p>Being a productive and effective citizen requires knowledge of our own society and other societies. How we use our land, water and air and the consequences of our choices is important geographical information. Citizens need accurate and up-to-date geographic information to make sound personal and community decisions. Informed teachers make a significant difference in how young people relate to local environments and local communities.</p> <p>Knowledge of geography is fundamental and essential in our daily lives. Social studies teachers need a sound background in geography.</p> <p>We need to expand rather than reduce the amount of geography preparation required of young people entering the teaching profession.</p> <p style="text-align: center;">Teachers cannot teach what they do not know.</p>
12/5/2006	Bill Brazier	Social Science Curriculum Supervisor Loudoun County Public Schools	<p>My name is Bill Brazier, and I currently serve as the Social Science Curriculum Supervisor for Loudoun County Public Schools. I’m speaking to you tonight from the perspective of someone in that position, who cares a great deal about our students’ education—especially in the fields of history and social science.</p> <p>My desire to speak tonight comes from one powerful observation I have made in my position over the last 4 years: our students and our teachers need more, not less, instruction in history and social science content.</p> <p>This observation comes from both our testing results and our work in staff development with our teachers. In staff development sessions and workshops that we plan from year to year, we are amazed not only by the number of teachers who request content sessions in history, government, sociology, etc., but by the content information we learn our teachers do not have during the conduct of these sessions.</p> <p>With our testing results, when we look at both our disaggregated data and “Student Performance by Question” reports over the past four years, we find our weakest spots to be in conceptual relationships between geographical location, land formations, resources-and the economies and social structures that develop in relation to them.</p> <p>In practical terms, this means that students come away from units on the Civil War memorizing certain battles and events – maybe even in the right sequence – but without an appreciation for the geographic, economic, and social conditions which caused the northern and southern states to be almost two different societies/countries in the first place. They know about the war, but don’t necessarily understand it. They miss questions on our assessments, and more importantly, miss key understandings that help them deal with their own historical context, when they don’t have the conceptual framework that a full and well-rounded social science preparation gives them – and that can only be given by teachers who have that same type of preparation at an advanced level.</p> <p>In reference to 8VAC20-22-140. Early/primary education preK-3:</p>

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			<p>Teachers are required, under the new guidelines, to have 6 semester hours in history, which must include American history and world history. They must also have 6 semester hours in geography and economics. This works out to one course in each of these four subjects. With this amount of preparation, teachers hardly have the cognitive time to develop conceptual contexts, and are thus not really ready to help the students build one.</p> <p>In reference to 8VAC20-22-150. Elementary education preK-6:</p> <p>Teachers are required to have 9 semester hours in history, and 6 semester hours of social science. The history course must include American and world history, and the social science courses must include geography and economics. There is nothing about Virginia history here, which is a content-rich curriculum that must be taught in grade 4 or 5. Teachers will be entering fourth grade classrooms under these provisions lacking not only content, but the conceptual links between it and economics and geography.</p> <p>In reference to 8VAC20-22-160. Middle education 6-8:</p> <p>Teachers are required to have 21 semester hours in history and social science, divided between American history, world history, economics, American government, and geography. This translates into 1 course per subject listed, plus two more unspecified. Teachers could conceivably have 9 semester hours in world history, 3 in everything else, and be placed in a middle school where the curriculum is dominated by US History and US Civics/Economics – as is most Virginia jurisdictions.</p> <p>In reference to 8VAC20-22-380. History and social sciences:</p> <p>Teachers are required to have 18 semester hours divided between American history, Virginia history, and world history. That would be an average of two courses per subject, or one course in two of them and three in one other. A teacher could enter a world history class to teach with just one course in world history in his/her background. Teachers are also required to have 6 semester hours of Geography and 6 in Economics. The Geography requirement is a reduction of 3 semester hours! I would like to ask the Board to consider increasing Economics requirement to 9 semester hours and leaving the Geography requirement at 9 semester hours where it stands now. That conceptual link between these disciplines is crucial to students studying our high school curriculum. It becomes even more important when we keep in mind that the state just added new Economics and Financial Literacy objectives to the curriculum for grades 6-12. True, there may be taught in Career and technical (sic) Education classes according to the guidelines, but not according to the requirement that ALL students be taught these objectives before graduation: Career and Tech. Ed. Courses are not required of all students, but Government is...</p> <p>Finally, one cannot compare social science and history to other content areas like English, math, and science when thinking about the total number of semester hours required. It is true that these other core disciplines have semester hour requirements that are lower than history and social science, but those disciplines do not offer a general certification and expect it to cover all</p>

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			<p>the fields within it. Science certification, for example, is not general. A teacher has to be certified in Biology or Chemistry; a “Science” certification will not allow a teacher to teach both those subjects. In social science and history, however, a general certification is supposedly sufficient to qualify a teacher to teach history, government, sociology, economics, and psychology. More semester hours for social science certification should, therefore be required than for other core subjects.</p>
12/10/2006	Gilbert M. Grosvenor	Chairman of the Board, National Geographic Society	<p>I am writing to express my concern about the proposed revision of the “Virginia Licensure Regulations for School Personnel.” The proposed revisions would reduce the number of semester hours required for history and Social Science licensure from 51 to 42 and more specifically reduce the requirements for geography from nine to six semester hours.</p> <p>Since the mid 1980s the National Geographic Society has invested a great deal of effort and more than \$100 million in a national effort to restore geography education to the classroom. Through a national network of State Geographic Alliances, we have helped tens of thousands of teachers elevate instruction in geography from tedious rote learning to the stage where students grasp the concepts that explain how and why people and places are distributed around the globe. The Virginia Geographic Alliance hosted by the James Madison University and Virginia Tech is a highly regarded member of that network. The Alliances have shown how geography provides the tools and the context for understanding environmental, cultural, political, and economic issues. Several of the state Alliances are demonstrating how learning geography can enhance the learning of reading and math. Geography is more than an important constituent of a liberal education, it is a widely recognized 21st century skill whose mastery is an essential tool for the success of American students.</p> <p>The Commonwealth of Virginia and the Virginia Department of Education have been valuable partners in our mission to improve geographic literacy. The Department has supported the Virginia Geographic Alliance and several years ago the State appropriated \$500,000 which was matched dollar for dollar by the National Geographic Society to create an endowment for geography education in the state. In addition, the NGS Education Foundation has awarded more than \$1 million in direct grants to the Alliance to provide continuing education for Virginia teachers.</p> <p>The federal government has also recognized the importance of geography. The “No Child Left Behind Act” includes geography among the “core academic subjects” that every student is expected to master and whose teachers are expected to be “highly qualified.”</p> <p>I understand the desire to streamline academic requirements for teachers, but reducing the semester hours required for geography preparation seems to send the message that the subject is considered peripheral to social science education. If helping students memorize state capitals and major landforms and bodies of water were all that we hoped to accomplish then six semester hours might be enough, but modern geography is far more than that and the consequences of illiteracy in the subject are far more serious. A recent article in the Denver Post newspaper reported the soaring demand for people qualified in geospatial technologies and the difficulty of finding employees with those geographic qualifications.</p>

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			<p>It seems to me that nine semester hours of geography is a thin enough qualification for social science teachers. To reduce the requirement to six hours will erode the quality of instruction that the Commonwealth of Virginia, the Virginia Geographic Alliance and the National Geographic Society have worked so hard to improve. I urge the Department to reconsider the recommendation.</p>
12/14/2006	Lorna S. Robertson Director	Office of Secondary Instructional Services Virginia Beach City Public Schools	<p>Please accept these remarks referencing the Proposed Licensure Regulations for High School History and Social Science teachers (VAC 20-21-290):</p> <p>Currently, the Commonwealth of Virginia mandates Standards of Learning for middle and high school social studies in five areas: Virginia and United States Government, Virginia and United States History, World History, Civics and Economics, and World Geography. Four of these are tested by middle school SOL tests and high school End-of-Course tests. At the present time, EOC scores on the World Geography SOL test are among the lowest in the Social Studies, and the economic strand questions on all tests are low.</p> <p>Hence, it is a great concern that the State Board is considering lowering the number of required college credits in content courses for licensure in the areas of Political Science and Geography for the history and Social Science endorsement.</p> <p>The History and Social Sciences are comprised of discrete disciplines. Teachers must have a solid grounding in each of disciplines in order to be effective. There is abundant research that supports the premise that teacher content knowledge is a primary factor in student academic achievement. The lack of teacher content expertise in the subject that is being taught can be addressed by continued strong support from the licensure regulations. Asking a history-trained teacher to successfully teach a World Geography class would have the same result as asking a physics-trained teacher to successfully teach a Biology class. The proposed reduction in licensure requirements would perpetuate a culture of “jack of all trades, and master of none.”</p> <p>Virginia Beach City Public Schools encourages the highest level of content preparation for teachers and would endorse the retention of current licensure standards, if not an increased requirement in geography and political science, in the Social Studies.</p>

Change in Student Teaching/Field Experiences

Date	Name	Title and Organization	Change in Student Teaching/Field Experiences
8/9/2005	John Hillison	Professor and Head, Agricultural Extension Education	I am writing to express concern with the proposed regulation of changing the required classroom student teaching hours from 150 to 300 and the total

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			<p>experience to be changed from 300 to 500 (p.25 of the proposal).</p> <p>The amount of hours in place is preparing future teachers quite adequately. Here are my concerns:</p> <ul style="list-style-type: none"> -There has been indication that teacher training institutions in the State already meet the proposed increased hours; however, there are numerous exceptions to that depending on the subject matter and endorsement area of the future teacher. -Student teaching is a partnership between the teacher training institutions and public schools. The public schools are very concerned with accreditation based on SOL test scores. It will work a great handicap on public schools to have veteran teachers in the back of the classroom supervising a novice student teacher for 300 hours while students are being prepared to take SOL tests. -Some have indicated it would be possible to complete the 150/300 hours experience in one semester; however, the university and public school semesters do not overlap perfectly. -I have yet to have anyone explain the problem that is being solved by significantly adding to the number of hours student teachers must complete. -There is a shortage of teachers in many endorsement areas. With a trend towards five year teacher preparation, acceptance of this provision could mean a six year teacher preparation program. -Some have suggested that No Child Left Behind legislation requires additional hours for student teachers. However, that is not true, it is not that prescriptive. The No Child Left Behind legislation defines a highly qualified teacher as having a bachelor's degree, be fully certified as defined by the state department of education, and be able to demonstrate subject matter competence in any core subject taught.
12/7/2006	Katherine C. Kersey	Chairperson Dept. of ESSE Old Dominion University	<p>At the present time, the new regulations (page 3) read: “ ‘Field experiences’ means program components that are conducted in off-campus setting. They include classroom observations, tutoring, assisting teachers and school administrators, student teaching and internships.”</p> <p>I would like to respectfully request that the wording be changed to: “ ‘Field experiences’ refers to classroom observations, tutoring, assisting teachers and school administrators, student teaching and internships made in any public school, accredited nonpublic school or campus school settings with teachers who are fully licensed in the Commonwealth of Virginia.</p>

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			<p>The current wording does not stipulate a public or non public setting, but it inadvertently excludes the use of on campus teacher training facilities such as the ODU Child Study Center, which is an accredited (SACS), licensed Special Purpose School designed specifically for training licensed teachers within the context of a state university teacher preparation program. The students (PK-6) complete 75 hours of the practicum experience under the supervision of licensed master's degreed teachers at the Child Study Center, and the remaining 75 hours in a public school setting.</p> <p>The training that PK-3 and PK-6 students receive provides hands-on experience working with Masters degreed, licensed teachers in exemplary classroom environments characterized by research based, developmentally appropriate practices, and proven positive classroom management and instructional interaction techniques that are linked to successful social and education outcomes for children. Teachers trained in our program are highly sought after and extremely marketable because of the outstanding skills they gain which training in this environment. Our practices and training techniques exemplify excellence in teaching practices and serve as a model for other preschool and kindergartens.</p> <p>We are requesting that our "on campus" facilities will continue to qualify as a state approved field experience or that some type of waiver be made that would allow for students to continue to be placed at the ODU Child Study Center for their field/practicum experience.</p>
11/28/2006	William H. Graves	Dean, Darden College of Education Old Dominion University	<p>This e-mail is intended as a request for a change in the proposed Regulations Governing the Review and Approval of Education Programs in Virginia (8 VAC 20-542-10 et seq.).</p> <p>As dean of the Darden College of Education at Old Dominion University, I request a change in the definition of field experiences which appears in the above referenced proposed regulations.</p> <p>The proposed definition of field experiences is</p> <p>"Field experiences" means program components that are conducted in off-campus settings. They include classroom observations, tutoring, assisting teachers and school administrators, student teaching, and internships.</p>

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			<p>If this definition were to remain, the PK-6 Elementary Education and PK-3 Early Childhood Education programs at Old Dominion University would be adversely affected. Let me explain how. Using this definition, Old Dominion University would not be able to use either our Child Development Center or our Child Study Center as a practicum site. Our centers enjoy SACS accreditation as a licensed special purpose school. The university sought this SACS accreditation separate from that of the university to ensure that the services provided and teachers employed by the university met the same standards public schools meet in Virginia and in the states served by SACS. The Child Development and Study Centers are widely regarded as models for the Commonwealth. The teachers employed to provide early childhood education services are required to have masters degrees in early childhood education, and we require them to be licensed in early childhood education by the Virginia Board of Education. These measures meet the requirements of NCLB.</p> <p>We request following modification of the definition of field experiences. The requested additional language is in italics and bold.</p> <p>“Field experiences” means program components that are conducted in off-campus settings or on-campus settings dedicated to the instruction of children who would or could otherwise be served by school divisions in Virginia and are accredited for this purpose by external entities such as regional accrediting agencies. They include classroom observations, tutoring, assisting teachers and school administrators, student teaching, and internships.</p> <p>Old Dominion University requests this change because we believe that the preparation of the graduates of our PK-3 and PK-6 programs who have</p>

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			<p>practicums in our Child Development and Child Study Centers are better teachers because of these field experiences and are better able to meet the instructional and other learning needs of their PK-3 and PK-6 pupils in Virginia’s schools. Also, we believe we are asking for a higher standard for on-campus settings that will not weaken the existing definition or intent of the Virginia Board of Education. Thank you for considering this request in the definition of field experiences.</p>
11/29/2006	Beverly J. Warren	Interim Dean School of Education Virginia Commonwealth University	<p>I appreciate the opportunity to speak at this public for its willingness to seek input from the variety of by the proposed revisions in the preparation and also commend you for your deliberate and dedicated method of preparing the next generation of teachers is safe to say that all schools of education in higher Commonwealth share that dedication and identify a “signature pedagogy” for the preparation of accomplishment this important initiative will require who are involved in P-16 education. Education is success of both individuals and nations in this 21st nation’s intellectual capital exceeds the value of its evolving to a place of prominence in the global sphere</p> <p>In any profession there are key elements that define what it means to be a professional, beginning with the ethical pledge that members of professions make to the welfare of all of their clients. It is no different in the profession of teaching and school administration where there must be a commitment to help ALL students succeed. Thus, how we prepare teachers and school leaders is vitally important because there must be a solid foundation to act effectively on that commitment. This requires that our practices and policies are grounded in strong evidence about what specifically comprises effective teaching and leadership. We are sorely lacking in strong empirical evidence regarding best practices, and schools of</p>

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			<p>education must lead the way in providing more clear evidence regarding the signature pedagogy for the preparation of school personnel.</p> <p>However, there are some components on which we have evidence-based best practices to begin the framework of a “signature pedagogy”.</p> <p>We know that a teacher’s solid preparation in a designated content area is positively related to student achievement. Likewise, there is strong evidence suggesting that learning how to teach allows teachers to better use their knowledge of what to teach. Thus, it is imperative that the Board address quality preparation of school personnel and ensure that there is equal rigor in the multiple routes to licensure. Studies indicate that teachers who pursued five year preparation programs were better prepared to meet the rigors of addressing the needs of all students early in their career and were more likely to stay in teaching for a longer period of time. I believe in alternative routes to licensure. I also strongly believe that equal rigor must be applied to all paths to licensure.</p> <p>We also have strong evidence that a key element of successful learning is the opportunity to apply what is being learned and to refine it. Though the importance of actual teaching/leadership experience has been reinforced by research findings verifying the value of practice teaching and immersion in school leadership, it is important to recognize that practice alone does not make perfect, or even good, performance. Although, there is no firm evidence that a 500 hour clinical experience is more valuable than a 300 or 400 hour experience, there is strong evidence that candidates for teaching and school leadership should be introduced early and often to authentic classroom and school leadership experiences. Permitting flexibility in the hours required for the final internship while mandating actual teaching/leadership experience hours across the curriculum may be a more valuable approach to the development of skilled teachers and school leaders.</p> <p>What is most important in the practice teaching experience is that candidates receive effective and competent feedback from experienced, highly qualified teacher supervisors. Identifying and rewarding mentor teachers and teacher leaders is one of the most vital elements in the preparation, induction, and retention of the next generation of teachers and school leaders. Just as accreditation of teacher preparation programs should not be a local decision of the university, the designation of teacher</p>

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			<p>mentors and teacher leaders should not be left in the hands of local school divisions. There is strong evidence that supports the importance of strong and effective modeling of good teaching/leadership practices. We have strong mentor training models in the Commonwealth, and Virginia could become a leader in the development of effective mentors and teacher leaders who can assist in the preparation, induction, and retention of promising young professionals. It will take a community of support from the state department, local school divisions, and teacher preparation programs to work together to model best practices. I strongly urge the Board to maintain central training and assessment model(s) for preparing clinical faculty.</p> <p>Lastly, a “signature pedagogy” for a profession cannot simply be a collection of content specific coursework coupled with creative tools of methodology. To prepare the next generation to be effective citizens in a global economy, we must have highly qualified teachers in every classroom – this includes more than content knowledge and solid pedagogy. It must include teachers who respect and value diverse learners, who can place teaching in the context of civic responsibility and social conscience, and who understand fully the “why” of education as well as the “how” of classroom practice. No set of required coursework experiences or complete “bag of tricks” can compare to teachers who have had the opportunity to engage in reflective thinking and interaction about the importance of an educated and ethical society and how they can contribute to the enhancement of the highest order of thinking and social responsibility in the citizenry of tomorrow. I urge the Board to re-think the deletion of preparation in the foundations of education. Rather, I would urge you to challenge schools of education to develop models for ensuring an understanding of assessment practices and interpretation of data, and employing effective classroom management techniques while maintaining a focus on a strong foundational base for the next generation of teachers and school leaders.</p> <p>I thank you for your time and willingness to listen. I pledge my support and that of the VCU School of Education in continuing to assist in defining and refining a “signature pedagogy” for the next generation of teachers and school leaders.</p>
11/29/2006	Dr. Michael Davis	Department of Teaching and Learning School of Education Virginia Commonwealth University	<p><i>Item #90—Proposal to increase the required number of hours for student teaching from 300 to 500 hours for all teacher preparation programs.</i></p> <p>VCU faculty would like to know the research base for increasing the total number of hours of student</p>

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			<p>teaching. Increasing the number of hours that teacher candidates must spend student teaching will have a financial impact on preservice teachers and may result in significant staffing implications. Without an adequate research base to support such a change, it will be hard to justify the significant staffing implications and financial costs to students.</p>
12/15/2006	Dr. Lissa Power de-Fur	Chair, Department of Education, Special Education, Social Work, and Communications Disorders Longwood University	<p>As students can receive excellent experience in their preparation to work in public schools in non-public school settings, the language regarding student teaching and practicum placements should be expanded to allow for placements with school age children in state facilities (DCE, WWRC, DMHMRSAS) and in approved private schools.</p>
12/5/2006	Dr. Daisy Stewart	Associate Director School of Education Virginia Tech	<p>I appreciate the opportunity to provide my comments regarding the proposed changes in regulations for licensure and education programs. As an educator and a citizen, I value the Board of Education’s commitment to the students and schools in the Commonwealth, and this is evidenced by their seeking public input on the important issues reflected in these proposals.</p> <p>The specific aspect of the changes that I would like to discuss relates to the supervised classroom experience required for teacher licensure. Currently, candidates for licensure are required to have a minimum of 300 hours of classroom experience, with at least 150 of those being supervised in direct teaching activities. The proposal would increase the classroom hours to 500, and double the hours of direct teaching, from 150 to 300.</p> <p>It is clear that meaningful classroom experiences are important for our future teachers. However, I have not found research indicating that this drastic increase in student teaching and other internship hours would result in teachers who are more effective or who have more successful students. Such research has definitely not been presented to justify this change.</p> <p>While many teacher education programs exceed the current minimum number of field experience hours, achieving the proposed number of hours could have a substantial financial impact on preservice teachers by extending the time they must commit to preparing for this career goal. It could also have staffing implications for both higher education institutions and local schools.</p> <p>One of the most important components of a student teaching experience is observing the experienced mentor teacher’s instructional strategies and student</p>

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			<p>interactions. Doubling the number of direct teaching hours required would cause the student teacher to assume the teaching responsibility for a greater portion of the student teaching semester. We are confident about the abilities of our student teachers, but we also know that they are beginners and are still developing their teaching skills. In my opinion, school administrators and parents might be hesitant to place too much of the responsibility for providing instruction and preparing students to pass high stakes tests in the hands of novices, rather than of the experienced teachers. This concern could make it difficult to secure appropriate placements for our preservice teachers.</p> <p>I hope that the Board will give serious consideration to maintaining the current minimum hours for supervised classroom experiences. This would give our teacher education programs the flexibility to work with school divisions to provide the highest quality during a range of classroom experiences, rather than focusing on a drastically increased number of hours. Thank you for considering my comments and those of others who have taken time to attend this hearing.</p>

Foundations of Education

Date	Name	Title and Organization	Foundations of Education
11/29/2006	Maika Philipsen	Faculty Member at Virginia Commonwealth University	<p>She urged that the board retain the Foundations requirement for licensure. She read several comments from practicing teachers in support of her position. One stated that she found the Foundations course one of the most valuable she took in her program, as it provided her opportunities to discuss the “whys” of the profession, giving her a deeper understanding of the profession and her role as a teacher. The course focused on broader themes including citizenship among students, and gave her a “big picture” awareness of teaching and insight into her role. She concluded by stating that the Foundations Course was essential to understanding where we have been and where we are going as educators.</p>
11/29/2006	Kurt Sternhagen	Assistant Professor Virginia Commonwealth University	<p>I have circulated a petition regarding the proposed regulations’ provision to eliminate from teacher <input type="checkbox"/>continue<input type="checkbox"/> a course in Foundations of Education. To date over 530 individuals have signed, many including comments about how important foundations has been to them as they have embarked on teaching careers. I will now read from the body of this petition. I will submit the entire petition and its signatory list prior to the December 15 deadline:</p>

Date	Name	Title and Organization	Foundations of Education
			<p><i>We the undersigned believe that coursework in Foundations of Education provides a unique and critically important component of teacher education, bringing perspective and meaning to the task of teaching and fostering consideration of the role of public schools in our democracy. Study in Foundations plays a key role in the development of reflective, thoroughly professional, and ultimately effective teachers for the Commonwealth.</i></p> <p><i>Teaching is an extraordinarily engaging practice requiring constant attention to tasks immediately at hand. Foundations places day-to-day classroom practice within wider contexts, providing time and space for consideration of such activities in light of broader aims; such as education’s role in supporting freedom of thought, social fairness, care for others, and democratic self-government, to name a few. Foundations study serves to help Virginia’s teachers understand, appreciate, and maintain these connections.</i></p> <p><i>Teaching is also a fundamentally human enterprise that cannot and should not be entirely prescribed and codified. While it is important that teachers learn effective methods and techniques, an understanding of broad educational goals and contexts in which their students and classrooms exist is necessary for teachers to respond effectively to particular situations. In other words, Foundation’s focus on the “whys” of education—from societal goals to cultural and social trends—are critical to effective implementation of the “how’s” of classroom practice.</i></p> <p>A main idea of the petition is that teachers must possess the kinds of skills fostered</p> <p>in foundations classes if teaching is to be a truly professional activity and that K-12 students benefit when this is the case. Many of the petition-signer’s comments support this notion, but I also want to point-out two other benefits of foundations that have emerged from the comments. First is that Virginia’s students are becoming more culturally diverse and that foundations coursework is an important pathway to the cultural sensitivity required to teach effectively amidst such diversity. One teacher commented: <i>“While diversity issues have been touched on in my other classes, it has been a mere fraction of the extent that the issues were covered in this class. I cannot imagine venturing out as an educator with out the knowledge I have gained in this course. Removing this course would be a disservice to Education.”</i></p>

Date	Name	Title and Organization	Foundations of Education
			<p>A second additional strength of foundations is that it can serve as an aid in teacher retention efforts. Understanding how working conditions affect teacher work, or why decision-making authority is as it is in schools, or why compensation structures are lacking or how to develop a meaningful philosophy of teaching or even what it means on a personal level to be a teacher can go a long way toward helping new teachers make sense of the circumstances in which they find themselves once out in the “real world”. As one signer noted: <i>“This class taught me so many valuable lessons and facts about the realities of teaching.”</i> Another said: <i>“It is precisely the LACK of social foundations training that has led to the teacher shortage and high turnover rate”</i> and an educational leadership student made the point that foundations: <i>“helps new people entering our profession to see the whole picture of education.”</i></p> <p>I thank you for this opportunity to speak and hope that you will reconsider the decision to eliminate foundations of education from licensure requirements.</p>
11/29/2006	Sam Craver	Professor Emeritus Virginia Commonwealth University	<p>My name is Sam Craver and I am a professor emeritus at Virginia Commonwealth University. I have been a teacher for 43 years, starting as a 7th grade public school teacher and later becoming a professor of Foundations of Education. As a professor I’ve taught in three states: North Carolina, Alabama, and Virginia, with most of my experience (35 years) as a professor at Virginia Commonwealth University. I am here today to speak against the proposal to delete the Foundations of Education from Virginia’s teacher licensure requirements. This part of teacher preparation is of singular importance; in fact, it provides a crucial background of professional knowledge about education and schooling. Time only allows me to highlight a few points:</p> <p>Foundations of Education is the only part of teacher certification programs that I’ve been associated with in three different states where the history and philosophy of American education is given any depth of consideration. Such study helps anchor prospective teachers in the fundamental justifications for widespread education in this country, ranging from Jefferson’s call for public education to develop democratic citizens in the 18th century, to the creation of state-wide systems of public schools as instruments of equality and social mobility in the 19th century, to the extension of education to every segment of American society in the 20th. In other words, the study of Foundations of Education provides prospective teachers with the background knowledge about what</p>

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			<p>the teaching profession exists to serve.</p> <p>Foundations of Education is the only part of initial teacher preparation that investigates the chief constitutional provisions and the legislative and judicial actions that brought about such developments as compulsory schooling, equal educational opportunity, and similar laws and public policies that govern the mission of schools and educators. It is the only part of initial teacher preparation that provides any depth concerning how schools are organized, governed, and financed.</p> <p>Moreover, Foundations of Education is the only part of teacher preparation where external social conditions and the larger social dynamics of American society (such as class and race) are studied for their impact on schools as institutions and on teaching-learning processes that are supposed to prepare students for the future.</p> <p>I could go on with many other examples, but for present purposes I hope these few will suffice. Critics may say that all of these things can be covered in the other courses and experiences provided in teacher preparation programs. My reply is that these other parts have their own, more specialized understandings to convey, such as human development and learning, curriculum and methods, and so forth. There simply isn't time in those parts of teacher preparation to address the content of the Foundations of Education: It is the only part devoted to general understandings of school and society needed by teachers in all the age, grade, and subject-matter levels found in the schools.</p> <p>Thank you very much for this opportunity to speak. I truly hope my remarks prove helpful to you.</p>
12/11/2006	Dr. Donald A. Myers	Professor of Education Old Dominion University	<p>I wish to comment on the proposal to eliminate Foundations of Education as a requirement for teacher certification in the Commonwealth of Virginia. It is difficult to believe such a proposal would be thought reasonable and desirable in a state with the historic heritage of the Commonwealth of Virginia.</p> <p>I served as Dean of the Darden College of Education, Old Dominion University, for nine years, 1985 through 1994. Previous to that time I served as Dean of the College of Education, the University of Nebraska at Omaha from 1980 to 1984. During my career I have been a teacher, principal, Assistant Superintendent for Curriculum and Instruction, and worked at the National Education Association and the United States Office of Education in Washington, D.C. I have a doctorate from the University of Chicago and have taught at</p>

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			<p>U.C.L.A., the State University of New York at Albany, North Carolina University at Chapel Hill, and George Peabody College for Teachers.</p> <p>I am opposed to the above proposal because my view is, and always has been, that Foundations of Education in THE most useful and meaningful course that students encounter in their teacher preparation program. If I were asked to rank order the education courses required for certification so far as their importance and relevance to a teaching career, Foundations of Education would be at the top as most important with Classroom Management last. I rank Classroom Management last not so much because of its lack of academic content, but because it should not be taught in isolation of student teaching.</p> <p>When I retired from the Deanship ten years ago, I was asked what courses I would like to teach as a full-time professor. My immediate response was Foundations of Education, precisely because of its importance in helping young persons come to grips with the most substantive issues regarding their teaching careers. During the ensuing ten years, I have taught undergraduate and graduate courses in the Foundations of Education to over a thousand students, all of whom were seeking teacher certification in the Commonwealth of Virginia. I can't tell you how many times students have written on their faculty evaluation form . "This is the most useful education course I have ever taken," or "Finally a course with some substance and relevance," or "I now feel prepared to teach children of all races and socio-economic backgrounds."</p> <p>I appreciate this opportunity to express my views on this important issue.</p>
11/28/2006	Wendy J. Atwell-Vasey	Associate Professor University of Mary Washington	<p>I think it is negligent to remove the Social Foundations of Education as a requirement for licensure because teachers must examine how social institutions and individuals' experiences within these institutions affect educational processes and social development! It is analogous to dropping history from the curriculum! Please don't do this!</p>
11/29/2006	Leanne Donelan	School of Education Virginia Commonwealth University	<p>"<i>Foundations of Education</i> has been by far the most valuable class in my teaching career. As a new high school social studies teacher, lesson plans and classroom management tricks are easy to come by, but it is a rare and cherished experience to discuss with my peers the fundamental "whys" of the profession. Why are we public school teachers? What do we value as a society? What do we hope to impart to our students? I</p>

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			<p>asked myself these questions in my <i>Foundations</i> class, and found that they were monumentally more important than learning the proper format of a lesson plan. Establishing long-term goals for myself and for my students has given me a sense of purpose and comfort, knowing that I believe in my role as an educator. As a social studies teacher, I believe we should be teaching our students to become active citizens in our democracy, not just preparing them for the next exam. <i>Foundations</i> challenged me to develop broader themes and encourage citizenship among my students. Just as we expect our students to learn critical thinking skills and become analytical learners, so must we as teachers.</p> <p>Teaching is not like writing a prescription for a problem; it involves reasoning, judgment, and an awareness of the big picture. <i>Foundations</i> is that outlet. It is an invigorating class that has prodded me to examine our values as a society, compare our culture to other schools around the world, and come to conclusions about the kind of teacher I want to be. <i>Foundations</i> helps to mold a teacher’s soul, without which strategies and management skills lack purpose and meaning. Each year I have found that my students will ask the same question, “Why do we have to learn history?” I know I will always have an answer for them, because <i>Foundations</i> has allowed me to answer that question for myself. “</p> <p>Ernest U Meier III Med University of Mary Washington Teacher of English at the Commonwealth Governor’s School</p> <p>Our educational system is the product of a cyclical process wherein policy talk, policy action, and implementation dance endlessly toward an educational golden mean. Contrary to popular belief, the educational system, albeit belabored at times by “innovators” is healthy. In it we see the deep roots of Democracy held fast in the rich loam of discourse — discourse prompted by such courses as SFE. Indeed, a solid grounding in the foundations of our honorable profession is essential to understanding where we have been and most importantly where we are going not just as practitioners but as a nation. As the authors Cuba and Tyack so eloquently state in their book <i>Tinkering Toward Utopia</i> “conversation about the purposes and character of schooling is [...] an essential way for citizens to exercise their trusteeship in preserving what is valuable in a common institution...” (p. 59). This continuing dialogue is a reflection of an evolving America, a mirror, if you will, of what we value. It is the collective voice of a country in search of its</p>

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			<p>identity. The Foundations course provides the knowledge as well as the tools to help educational practitioners reflect on this identity, indeed, it is the one course that makes teachers aware that they are instrumental in shaping this identity in the first place.</p> <p>These wise practitioners before you today—dedicated classroom professionals who seek remuneration not in the fiscal but in the healthy future of our country—desire that you preserve what they believe is valuable; and they have faith that your wisdom will help you see the value in retaining SFE as a required course in the teacher education curriculum.</p>
12/4/2006	Mary E. Andersen, M.Ed.	Third Grade Lead Teacher J.W. Alvey Elementary School Prince William County Public Schools	<p>I recently graduated from the University of Virginia with a Masters Degree in Social Foundations of Education. While taking the SF course during the preparation for my teaching license I realized how important Social Foundations is to the basic understanding of the educational process in America. It broadened my horizons and provided invaluable assistance to my comprehension of educational practices.</p> <p>I am currently teaching third grade at J.W. Alvey Elementary in Haymarket, Virginia for Prince William County. This course has not only prepared me to become a more effective educator, but it has enabled me to more effectively communicate with my students parents when I explain how and why about the particulars of their child’s education.</p> <p>It is vitally important that teachers learn effective methods and techniques. But an understanding of broad educational goals and contexts in which their students and classrooms exist is necessary for teachers to respond effectively to particular situations. Social Foundations focuses on the “whys” of education. It places in context everything from societal goals to cultural and social trends affecting all aspects of education. This course is critical to effective implementation of the “hows” of classroom practice.</p> <p>I respectfully request that the Virginia Department of Education withdraw the proposal to eliminate Social Foundations of Education from teacher licensure regulations. To do so would be a disservice to not only future teachers, but the children of Virginia.</p>
12/7/2006	Dr. Kristi Johnson	Associate Professor of Education Marymount University	<p>Foundations of Education is an essential course for all future educators. We must know about our history, sociology, philosophy, and international education issues and information. Without these ingredients, an educator is not grounded in ways that provide solid thinking for all teachers. We must preserve our Foundations of Education! Thank you for your</p>

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12/7/2006	John Thomas Stroup	Ph.D. candidate – Curry School of Education Research Fellow – Federal Executive Institute University of Virginia	<p>consideration.</p> <p>I am writing to <input type="checkbox"/>continue you from removing the requirement that teachers take a Foundations of Education course and instead take a data management course.</p> <p>I strongly support the increased hours of preparation before teachers begin teaching, and I believe that new teachers will learn how to use data to inform their teaching during this time. However, I can't see how they will have the opportunity to inquire into the great history and philosophies of education outside the academy.</p> <p>We want teachers with depth of knowledge and the skills to inquire into the difficult issues that face student learning in the classroom. We know that teaching requires the imagination to understand how to deliver content, promote critical thinking, and basic educational skills to young people of various ethnic, cultural, and economic backgrounds.</p> <p>Using data to inform teaching does absolutely nothing if you do not understand to whom you are delivering curriculum and instruction.</p> <p>I strongly encourage you to rethink this proposal. What you should be proposing is that teachers get both a deep understanding of the foundations of education as well as in-depth practice at using data to inform your teaching.</p> <p>Do not make this critical error and think that you are helping teachers learn something in the classroom that they should be learning on the job.</p>
12/8/2006	Koliene Alicia Sistik	Student James Madison University	<p>I am a student at James Madison University, and I am aware that The State of Virginia is considering eliminating Social Foundations of Education as a requirement for teacher licensure. After completing this course myself this semester I feel EDUC 360 was a meaningful learning experience for me and I think future teacher education students in Virginia should</p>

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			<p>have the opportunity to take such a course. The material that was covered are essential for us to understand before we face these things in the classroom.</p> <p>This coursework is essential for the development of reflective, professional teachers through the cultivation of historical perspectives and the ability to place school enterprises within larger social, cultural and political contexts. Without this course I would have NEVER been exposed to this material in such a fashion. We need to focus on making better well rounded teacher who are sensitive to these things. I have learned in this class how to tactfully approach subjects that have often been labeled as taboo.</p> <p>Virginia and its student population are becoming increasingly diverse. Foundations coursework is one of the primary places for prospective teachers to learn about/wrestle with the question of what it means to teach in a culturally diverse society.</p> <p>On one last note one reason why teacher retention rates are low is because they do not understand the ways in which classrooms are part of the larger institution of public school and how the school and society relate. Foundations coursework helps prospective teachers make such connections. As well as show us what it is really going to be like when we get in there. Out of the twenty five courses I have taken thus far at James Madison University, this course I can say has prepared me the most.</p> <p>I hope that you consider the opinions of someone who has been there and who has benefited most from this course being in place.</p>
12/8/2006	Lisa Rostiser		<p>It has recently come to my attention that Social Foundations of Education is at risk for being cut from the course</p>

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			<p>requirements for teacher education. As a future teacher and past student of that course, I feel it would be to the student's detriment to not require such a worthwhile and valuable course. The material covered in that course helps future teachers develop skills and strategies for thinkers future work in an increasingly diverse classroom. The foundations taught in that class will help teachers to come up with solutions when faced with confusion or frustration in their future classrooms. In closing, it would be harmful both to the future teachers and their future students to not require Social Foundations of Education for teaching licensure and I sincerely hope the department of education will reconsider cutting Social Foundations of Education from the teacher education program.</p>
12/12/2006	Gilma B. Steele		<p>I recently learned that the Virginia Board of Education is considering removing the Foundations of Education requirement for new teachers. As someone who has benefited from this program, I feel obliged to let you know that I and others see this as an integral part of preparing young teachers for success, not in the classroom, but for successful growth as professionals.</p> <p>One of the growing issues in public education is multiculturalism; more specifically, how to effectively incorporate education from a multi-cultural perspective into the traditional American curriculum. During my educational training, the Foundations courses were the only classes that directly tackled the issue of multiculturalism. Everyday, we encounter students of varied backgrounds. As teachers, we need to know how to effectively approach those differences thereby ensuring success for all students, regardless of their background. The Foundations classes afford aspiring teachers opportunities to examine the issue in-depth.</p> <p>Additionally, when I moved to the United States seven years ago, I knew that I wanted to become a public school teacher but I was very ignorant about the history of the American education system. The Foundations courses provided me with a sound contextual understanding of education in America and its importance in society. In my U.S. History course, I have had students inquire about the origins of the public school system. Using much the information that</p>

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			<p>I learned in my Foundations courses, I was able to provide an informed answer to their questions.</p> <p>Ladies and gentlemen, having personally benefited from this program, I implore you to reconsider your decision to get rid of this invaluable program because it really would be unfortunate if our up and coming teachers are deprived of such a vital component of their professional training.</p>
12/13/2006	Dr. Jo Tyler	Associate Professor of Linguistics and Education University of Mary Washington	<p>I am writing to urge that Foundations of Education be maintained as a requirement for teacher licensure in Virginia. As the coordinator of teacher education for English as a Second Language at the University of Mary Washington, I have no personal stake in this decision. However, I make this plea for the pre-service and in-service teachers I work with, and for their students.</p> <p>Foundations of Education is the one licensure requirement that directly addresses issues of cultural diversity in our schools. Approximately 10 percent of students in Virginia public schools are African American and another 10 percent are English language learners. Nevertheless, the graduates of our universities who enter the teaching profession do not reflect this profile and until they study Foundations of Education they have very little meaningful exposure to multicultural issues. With 20 percent of our public school students coming from ethnic minority backgrounds, understanding the impact of culture on classrooms and learning is a necessity for these teachers. As the number of English language learners continues to grow in Virginia, all teachers (not just those licensed to teach ESL) need training in this crucial aspect of pedagogy.</p>
12/15/2006	Dr. Jan S. Stennette	Dean, School of Education and Human Development Lynchburg College	<p>I only have a few comments:</p> <p>Let's keep the foundations course—educators need that background</p>
12/14/2006	Dr. Brenda G. Gilman	President, Virginia Association of Colleges of Teacher Educators (VACTE)	<p>On behalf of the collective membership of the Virginia Association of Colleges for Teacher Education (VACTE), which represents the 37 teacher preparation programs in colleges and universities in the state, I take</p>

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			<p>this opportunity to respond the proposed changes to the <i>Regulations Governing the Review and Approval of Education Programs in Virginia</i> and to the <i>Licensure Regulations for School Personnel</i>. As education professionals who are deeply committed to high quality teacher preparation, we have followed and discussed the effect these proposed changes will have on the preparation of future educators in our programs across the commonwealth. The following comments are offered:</p> <p>1.) Of great concern is the elimination of the foundations of education requirement. This requirement is the cornerstone and anchor of teacher preparation since it provides important and vital information that teaching professionals need in order to understand and become grounded in the profession. As a result of the study of the development of education in this country, teachers have a greater sense of the importance of education as an integral part of our national and state history. It is in a foundations course where students begin to formulate their own thinking about education and address critical issues of school finances, governance, organization, and law as well as gaining an in depth perspective of issues related to diversity including cultural and language differences that impact our classrooms daily. It is often in this course that students discern if teaching is a suitable fit for the utilization of their personal characteristics, talents, and values as they reflect upon the information and concepts that are presented in a foundations course. It is our hope that you will reconsider the elimination of this valuable course, since other courses do not naturally lend themselves to embracing these general understandings necessary for sound teacher development.</p>
12/15/2006	<p>Eric Bredo Professor and Coordinator, Social Foundations Program</p> <p>Hal Burbach Professor, Social Foundations Program</p> <p>Jen □ontinue Professor, Social Foundations Program</p> <p>Diane Hoffman Associate</p>	University of Virginia	<p>We are very concerned about the proposed change in required coursework for teacher licensure in Virginia. It has been a tradition in Virginia, as in most other states, for those seeking teacher certification to be required to take one or more courses in Social Foundations of Education. As of 1997 71% of all teacher preparation programs in the US required such coursework and 90% of the top ten education schools offered doctoral degrees in the field. We understand that there are new pressures on teachers today but believe that coursework in Social Foundations remains vitally important. In fact, it is even more important today with all of the increased pressures place on teachers.</p> <p>The primary rationale for coursework in Social Foundations is that it gives teachers wider perspective on what they do. Such perspective is important because it enables them to have a fuller understanding</p>

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	Professor, Social Foundations Program		<p>of their role or mission. It is all too easy for those in any job to develop tunnel vision, focusing only on the immediate task at hand. This is understandable, but lack of wider perspective can result in teaching and education that are unwise and unethical. To act wisely as well as ethically one has to understand how one's work relates to others in the school, and how the school's efforts relate to the wider community. One needs to understand how different efforts fit together or how they get in each other's way. As social conditions change teachers also need to be able to think "outside the box" if they are going to adapt successfully. Social Foundations helps in this</p> <p>By making them more sensitive to the social and institutional contexts in which they work and giving them a richer and more varied set of ideas on which to draw.</p> <p>This point can be summarized by saying that educators must themselves be educated. If we want teachers to foster students who are thoughtful, use good judgment, and are sensitive to the ethical implications of their behavior, these qualities must be [sic] also be fostered in teachers. To do so they must understand the wider meaning of their own work and the way it connects to networks of social relationship extending beyond the classroom. Social Foundations provides the only occasion for teachers to have a chance to do this. Experience in courses like those on the history and sociology of American education introduces them to the character of the American educational system, the way it has been and is related to the wider the [sic] community, the difficulties it has experienced and the success and failure of efforts to address those difficulties. Experience in philosophy of education shows them where present educational theories came from and what values and assumptions are embedded in them, as well as introducing them to other ways of thinking about education. Anthropology of education helps give teachers a better understanding of mainstream American culture and the cultures of students and the way they interact in schools. It treats issues related to multi-culturalism with far greater sophistication than most courses having the title.</p> <p>All of these courses provide <i>much</i> wider perspective on teaching than is gained in instructional design or classroom management. Instructional management and design are fine in their place, but it is all too easy for narrow attention to immediate goals to undermine the very thing one is attempting to foster. To avoid this, teachers need to understand the wider meaning or significance of what they are doing. Social Foundations plays a centrally important role in helping</p>

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			<p>them do so.</p> <p>We sincerely hope that you and the other members of the Professional Licensure Committee and the Advisory Board on Teacher Education and Licensure will see the need for such courses in the education of Virginia’s teachers. We believe they are vital to the Commonwealth. They are vital in just the way its founders thought education vital to its democratic flourishing two hundred years ago.</p>
Undated	Joe Davidson	Student Radford University	<p>My name is Joe Davidson and I am a student at Radford University studying within the field of Special Education. I am currently taking the only foundations of education course offered at Radford University. I am against the removal of this course as a requirement for Graduation from the Teacher Education Program for three simple reasons:</p> <ul style="list-style-type: none"> • Understanding the History of Education • The Broadening of Horizons, and • The Development of a Personal Teaching Philosophy <p>1. Understanding the History of Education- The Professor of the foundations course that I have been a part of this semester has taught me a great deal about the History of Education. Let me ask you, would you send your son or daughter to a Psychologist or a counselor who had no concept of the history of their professional field? Understanding the history of education unlocks keys for the future. It provides stepping-stones upon which future educators can walk in order to take us further down the path of Education. If we cannot build on the success of the past, we have no foundation on which to stand. If we cannot learn from the mistakes of the past, we are only left with the present ones.</p> <p>2. The Broadening of Horizons - Not every individual entering the teacher education program has been exposed to cultural diversity. This course provides the opportunity to relate with the thoughts, opinions, feelings, and lives of others that might be foreign to them. Would you want your child to learn from a teacher who has no concept of your cultural norms and values? This could very likely be the case is [sic] this Foundations of Education course is removed.</p> <p>3. The Development of a Personal Teaching Philosophy- This course has done more to provide me with a picking ground of educational philosophies than the majority of my senior level courses. There is no doubt in my mind that I will one day be a great educator.</p>

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			<p>There is also no doubt that this foundational course provided many of the bricks that laid the foundation of my teaching philosophy.</p>
Undated	Dr. Kristan A. Morrison	Assistant Professor School of Teacher Education and Leadership Radford University	<p>These comments are in regards to the changes to the coursework requirements for licensure in multiple areas, including alternative routes to licensure. Under the “professional studies” requirements of the proposed regulations, the 3 credit hours of coursework in social foundations of education-which are currently a part of the regulations-are absent.</p> <p>There is no rationale given for why the social foundations course is no longer a required course for licensure. I wish to provide a rationale for why it should continue to be a required course for licensure.</p> <p>Most important is the fact that a social foundations course can provide our pre-service teachers with an opportunity to see American education in a whole new light-to see the familiar as strange, if you will. Schools are familiar to pre-service teachers. They have been students in them for over 14 years by the time they take a foundations course. Because of this familiarity, pre-service teachers often approach American education with an uncritical mindset. But is this what we want? Teachers who are uncritical? Social foundations courses help pre-service teachers to see education with a new set of lenses and help them to explore vitally important questions regarding education. These questions include, but are not limited to the following:</p> <ul style="list-style-type: none"> • What are hidden lessons that schools teach our students? • Why do we grade? • Why do we track? • Why do we teach what we teach and why do we teach it the way we do? • What is and what <i>ought to be</i> the purpose of education? • How has American education changed over time and why are these changes good or bad for democracy? • What role does school financing play in a teacher’s life and in social class reproduction? • What’s the relationship between race, ethnicity, social class, and gender and school success? • What does it mean to be intelligent? • What’s the role of standards and standardized tests? • Who makes the decisions in schools? • How are schools organized and why? • Is there a difference between school and education?

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			<ul style="list-style-type: none"> • Can schools contribute to the process of human liberation? <p>Without time to look at the why's [sic] of education, our students will only become masters of the how to's [sic]. While methods of teaching ARE important to know, where's the heart and soul? Where's the commitment to democracy and a moral and liberating purpose for education?</p> <p>We need social foundations courses to answer all the questions I have posed here and help our pre-service teachers become truly reflective practitioners. We need social foundations courses to help ignite in pre-service teachers a fire that burns for equity, compassion, justice, engagement in learning and social change. We need pre-service teachers who have developed well-thought-out visions of education, and not just have a mastery of methods. It is one's vision or philosophy of education that really drives what methods and approaches one uses in teaching, and so we need teachers who have a deeply considered philosophy of education that will undergird their skills at things like classroom management, instructional design, and assessment practices. Without such a philosophy, we just have an empty balloon that is tossed about by any change in educational winds. We need to keep social foundations courses as a required part of teacher licensure in Virginia.</p>
Undated	Jim Garrison		<p>I would like to express my grave concerns about the elimination of the social foundations of education as a required course from teacher education and state licensure. This is the only course in the teacher preparation curriculum that actually looks closely at issues of diversity (including race, ethnicity, social class, special needs, gender, immigrants, etc.) as well as multicultural education together, in depth, and at the same time. It is also the only course that focuses on the history of public schooling, how school systems work at the building, county, state, and federal level the profession of teaching, and the courts and the schools. All of these are required for any NCATE certified course as well as most other forms of certified teacher education. There is simply not sufficient room for this material to be included in other courses in a properly sequenced, in-depth, and comprehensive manner, especially given the 18-hour restriction and the introduction of an instructional design based on assessment data course that obviously cannot deal with these topics in profoundly meaningful ways.</p> <p>Increasingly, schooling, is becoming merely technocratic, purely intellectual, and governed by experts who design system from afar to meet the</p>

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			<p>concrete needs and desires of flesh and blood students, parents, the democratic citizen, business, and industry. Traditionally, the social foundations class has been the one place in the curriculum where teachers must discuss the moral nature of teaching, its structure and challenges, legal obligations, ethical duties, its aesthetic beauty, and the wonder of those exhilarating moments when teacher connect with students and they learn, and what it means to teach in a democratic nations [sic]. The last expresses my great concern. We must not forget that for the vast majority of teachers, the call to teach answers deep, often spiritual, needs to engage in some caring, compassionate activity self-transcending directed toward the good of others and the community as a whole. Once we eliminate the one place in the required teacher education curriculum where preservice teachers can reflect on their calling and the larger challenges of the students, parents, school systems, and communities they seek to serve, not only will the attraction to teach diminish, but so will their ability to answer their calling competently.</p> <p>Teaching is not primarily a technical activity, although good technique is necessary; it is primarily a moral craft. While other courses may refine the craft of teaching, the social foundations course has been the one place the moral meanings and values of the art of teaching have been set inside the larger social context of schooling in American society. When teachers do not receive a proper understanding of the character of education, they are poorly prepared to engage in the activity of teaching. The result is too often early burnout, or worse still, socially irresponsible teaching by those who should leave, but do not. The social foundations allow prospective teachers to confront “the real world of teaching” and make an informed choice about teaching as a career. Those who feel the call to teach until confronted with the realities will leave after their first year, at great emotional and pecuniary expense to all involved.</p> <p>I thank you for your time and attention to this matter of concern not only to the preparation of future teachers, but I believe the future of the democracy.</p>
12/15/2006	Dr. Alice L. Young,	Associate Professor School of Education and Human Services Marymount University	Marymount University’s Teacher Education program prepares future teachers to have the ability to act as educational leaders in the diverse school settings where they will work. With this aim in mind, we respectfully believe that a course in the Foundations of Education is an important part of a professional preparation program for teachers. Educational history and philosophical theories helps future teachers understand the [sic] how their personal philosophy of education contributes to their everyday classroom teaching. Additionally, in

Date	Name	Title and Organization	Foundations of Education
			<p>[sic] Foundations of Education courses provide future teachers with basic knowledge of the legal aspects of education in the USA, an understanding of the basic education administration and school governance, an understanding of the demographics of the population of students that come to the twenty-first century classroom, and a chance to reflect on current political and social issues and their impact on learning. A course in Foundations of Education lays a foundation for critical decision making and provides needed background knowledge for future teachers.</p> <p>Additionally, we believe that classroom management is best learned within the context of the school setting and as it is integrated with instructional decision making. Particularly with secondary students, classroom management is an integral part of the instructional practices of the teacher.</p> <p>Therefore, we oppose eliminating Foundations of Education as a licensure requirement and believe that classroom management should not be viewed as a 3 hour course, but should be required as an integral part of instructional methods.</p>
12/5/2006	Maura Wilson	Student in Master’s Program University of Mary Washington	<p>My name is Maura Wilson and in a little over a week I will complete my work towards a Masters of Education from the University of Mary Washington. While I will not be an official practicing teacher until January 1, I do have experience in the classroom and I believe I represent an important voice in this debate: that of the licensure candidate.</p> <p>I took Social Foundations in the first semester of my teaching program and I cannot imagine succeeding as I have in my other courses if it weren’t for that class. Foundations offered me the chance to step back and consider the fundamental theories, broad implications, and major purposes of our practice. It is the only course that demands we think critically about the role school plays in our community, our society, and our democracy. This high-level investigation inspires debate, research, and innovation-components which are vital to ensuring we are providing high quality, demanding, and appropriate education for the children or our Commonwealth.</p> <p>Eliminating Social Foundations would deny us the opportunity to think fully and critically about the system we are entering. Initially, this will limit our performance in other licensure courses. Ultimately, this will cripple our ability to think critically about both the work we do within our classrooms and the role of our broader profession-having failed to develop a strong sense of purpose, we ensure that our system</p>

Date	Name	Title and Organization	Foundations of Education
			<p>will not evolve, will not improve, and will not succeed.</p> <p>We will compile our tool-kits of useful teaching strategies but we will lack the direction offered by a thorough understanding of the theoretical components of education. You need a hammer and nails to build a house, but you also need a blueprint. We'll have all the HOWS of teaching but none of the WHY. The No Child Left Behind Act demands that our nation's [sic] over 6 million teachers be "highly qualified"-denying teaching candidates the opportunity to engage in the critical examination of the social foundations also denies us that label. To be fully prepared for the classroom-to be highly qualified-we must step back and scrutinize our practice and articulate our purpose. Only then are those methods and strategies we acquire through our program truly meaningful.</p>
Undated	Kurt Sternhagen	Assistant Professor of Education Virginia Commonwealth University	<p>My name is Dr. Kurt Sternhagen. I'm an assistant professor of education at Virginia Commonwealth University and a former public middle school teacher in Virginia. I am troubled by the provision in the proposed licensure regulations that would eliminate the foundations of education requirement. I have circulated a petition in order to give future and current teachers, administrators, school of education personnel, parents and other concerned citizens the opportunity to register their thoughts on the topic. I have attached the petition for your perusal. There are 621 signatures on the petition and I hope that you will read the many thoughtful comments regarding the importance of foundations coursework in teacher preparation programs. Although there are a variety of reasons given as to why foundations of education is not an expendable part of teacher preparation, three themes have emerged from the comments:</p> <ul style="list-style-type: none"> • Foundations coursework is essential for the development of reflective, professional teachers (see petition itself for a description of how foundations courses foster such development) • Foundations coursework is one of the primary places for prospective teachers to learn about/wrestle with the question of what it means to teach in our increasingly culturally diverse society. • One reason why teacher retention rates are low is because they do not understand the ways in which classrooms are part of the larger institution of public school and how the school and society relate. Foundations coursework helps prospective teachers make such connections.

Date	Name	Title and Organization	Foundations of Education
			<p>That the proposal to eliminate foundations coursework from licensure has no stated rationale at all and no empirical evidence in its support is deeply disturbing. I hope that this petition along with the numerous public comments and the many letters and e-mails you have received in support of foundations will encourage scrutiny of the questionable origins of this proposed change as well as of the ways in which foundations coursework is critical to teacher preparation.</p> <p>In conclusion, foundations is not needed if developing professional, reflective teachers ready to deal with the challenges presented by increasing student diversity is not a priority for teacher preparation in Virginia. It is, however, crucial if these characteristics are what we expect from our teachers.</p> <p>I thank you for this opportunity to be heard and hope that you will reconsider the decision to eliminate foundations. Please do not hesitate to contact me should you have any question or want to discuss the matter.</p> <p style="text-align: center;">A Letter to the VA Dept. of Ed. In Support of Continued Development of Reflective, Thoughtful and Professional Teachers</p> <p style="text-align: center;"><u>View Current Signatures – Sign the Petition</u></p> <hr/> <p>To: Virginia Department of Education</p> <p>The Virginia Department of Education has proposed to eliminate Foundations of Education requirements from their teacher licensure regulations. Foundations of Education has been a requirement in Virginia for at least the last 30 years and as of this date, no rationale for the change has been offered.</p> <p>We the undersigned believe that coursework in Foundations of Education provides a unique and critically important component of teacher education, bringing perspective and meaning to the task of teaching and fostering consideration of the role of public schools in our democracy. Study in Foundations of Education plays a key role in the development of reflective, thoroughly professional, and ultimately effective teachers for the Commonwealth.</p> <p>By its very nature teaching is an extraordinarily engaging practice requiring constant attention to tasks immediately at hand. Foundations of Education places day-to-day classroom practice within wider contexts, providing time and space for consideration of such</p>

Date	Name	Title and Organization	Foundations of Education
			<p>activities in light of the overall aims of education; such as education’s role in supporting freedom of thought, social fairness, care for others, and democratic self-government, to name a few. Historically, Virginia has served as a point of origin for many of the realizations of the crucial role education plays in our democratic society and Foundations of Education study serves to help Virginia’s teachers □continue to understand, appreciate, and maintain these connections.</p> <p>Teaching is also a fundamentally human enterprise that cannot and should not be entirely prescribed and codified. While it is important that teachers learn effective methods and techniques, an understanding of broad educational goals and contexts in which their students and classrooms exist is necessary for teachers to respond effectively to particular situations. In other words, Foundations of Education’s focus on the “whys” of education-from societal goals to cultural and social trends affecting all aspects of education-are critical to effective implementation of the “hows” of classroom practice.</p> <p>We, the undersigned, hereby petition the Virginia Department of Education to continue to equip Virginia’s teachers not only with the practical methods and techniques to be successful, but also to encourage the development of the frameworks to understand how, when, and why to apply those tools in light of the broader contexts of education. Foundations of Education studies explicitly facilitate the development of such frameworks. We request that the Virginia Department of Education withdraw the proposal to eliminate Foundations of Education from teacher licensure regulations.</p> <p>[Followed by <u>621 names</u>, many of whom made additional comments in support of the petition]</p>
12/14/2006	Dr. Susan G. Magliaro	President Association of Teacher Educators in Virginia	<p>We respectfully request that the Foundations requirement be kept as a key curricular component of the professional students requirements. Foundations courses offer the “foundation” for the profession: history, rationale, philosophy, as well s a close look at some of the key issues in schools today: diversity, cultural differences, culturally responsive pedagogy, finance rules/regulations/perspectives for public schooling, etc. The foundations experience provides students with a key opportunity to articulate their professional philosophies, the central guiding statement to enduring commitment to the profession.</p>
11/30/2006	Dr. Brenda G. Gilman	Chair, Education Department Randolph-Macon College	<p>After long and thoughtful consideration of the proposed regulations that affect teacher preparation programs, the Randolph-Macon College Education Department offers the following comments:</p>

Date	Name	Title and Organization	Foundations of Education
			<p>We disagree with the elimination of a foundations of education course as required professional coursework for teacher preparation. It is in the foundations course that pre-service teachers learn about and appreciate the significance of the history of education in America. Students also learn about the structure of education through understanding how education is financed, governed, and is addressed in the law. Many connections are made for students as they learn about classroom culture, the development and implementation of curriculum, and their relationship to effective instruction. Standards and assessment and the vital role they play in education are included. It is in the course where students formulate their personal philosophies of teaching and learning after studying the influence that the Greeks, Europeans, Native American, and other represented cultures have on American education. Reflective practice regarding these varied and important topics is born in this course. Through this course, establishing relationships of the importance of all other required courses is made possible.</p>
12/11/2006	Dr. Lynn H. Wolf	Chair, Education Department Averett University	<p>Foundations courses should remain as a part of the allowed education program offerings. This is a critical and extremely necessary course, the content of which would be difficult to incorporate appropriately or segment into other courses.</p>
12/1/2006	<p>Dr. John R. Goss, III</p> <p>Dr. H. Jurgen Combs</p> <p>Dr. Pam Stockinger</p> <p>Dr. Larry Brooks</p>	<p>Associate Dean for Graduate Studies</p> <p>Director, Teacher Licensure</p> <p>Director, Master's in Teaching Program</p> <p>Director, Master's in Administration Program</p> <p>Shenandoah University</p>	<p>Foundations of Education is a course that contains information that simply is not covered in any other course nor cannot be logically integrated in other course material. For example, Foundations of Education is the only place in a program where students receive basic information on legal issues. Yes, SPED legal requirements are covered in curriculum courses, for example; however, information about student and teacher rights, copyright laws, and the like do not fit logically into other courses. Moreover, school governance is an area critical for teachers to understand. For example, we just finished exploring school funding. Several of the teachers in the class were provisionally licensed teachers; it was incredible to see the misinformation that these students had. Several thought the bulk of school funding came from the federal government.</p>

Instructional Design Based on Assessment Data

Date	Name	Title and Organization	Instructional Design Based on Assessment Data
undated	Maritsa Lager and Richard Strauss		<p>We want to commend the Board of Education for its recommendations to add the concept of “Instructional Design Based on Assessment Data” to the regulations concerning educational programs in Virginia. Stiggins (2005) clearly states the need for pre-service teacher training in assessment. Section C in this document, however, addresses a traditional view of assessment to support learning by monitoring and diagnosing learning. It stops short of including strategies that directly involve students. Black and William (2002) make a strong case for expending educator’s view of assessment by shifting its use from monitoring and diagnosing learning (assessment of learning) to the idea of assessment for learning. They define assessment for learning as “any assessment for which the first priority in its design and practice is to serve the purpose of promoting pupils’ learning.” To fully promote learning, an assessment activity “provides information to be used as feedback, by teachers, and by their pupils, in assessing themselves and each other, to modify the teaching and learning activities in which they are engaged.” This is a broader concept of assessment than that which is currently outlined in Section C. Based on the work of Black and William, Rich Stiggins, and other researchers, we request that section C on “Instructional Design Based on Assessment Data” be expanded to address skills in the key concepts of ongoing formative assessment. These should include building teacher and student involvement to address:</p> <ul style="list-style-type: none"> • learning targets (i.e., where the learner is going) • identifying the learners’ current position with respect to these targets • establishing strategies to achieve the target <p>Teachers would learn how to increase student involvement in the assessment/instruction process to include “activating students as instructional resources for one another...[and] as owners of their own learning (D. Williams, 2005).</p>

Date	Name	Title and Organization	Instructional Design Based on Assessment Data
			<p>Assessing for learning strategies have a strong positive effect on improving students learning,. Stiggins, in his 2005 presentation at the ETS Invitational Conference in New York cited work by Bloom (2004), Black and William (1998), Meisels, et. al. (2003), and Rodriguez (2004) that showed gains of 0.5 to 2.0 standard deviations in student performance as a result of using these assessment [sic] for learning strategies. Assessment for learning strategies were found to be particularly effective with traditionally low performing students.</p>
			<p>We want our children to understand the relationships between assessment and learning. Teaching children how to use feedback to make decisions and to improve their own performance is key. To have teachers to simply construct and interpret data is only a part of the picture.</p>
12/5/2006	Dr. Steve Myran	Research Scientist Old Dominion University	<p>In regards to item C, Instructional Design Based on Assessment Data, I believe that the current wording does no represent the major skills that teachers need to be successful in the classroom. More recent approaches stress the need for a balanced approach to assessment literacy, an approach that stresses both assessment <i>of</i> learning and assessment <i>for</i> learning. It is recommended that the following sentence be included in the regulations:</p> <ul style="list-style-type: none"> - Instructional Design Based on Assessment Data. Skills in this area

Date	Name	Title and Organization	Instructional Design Based on Assessment Data
			<p>contribute to an understanding of the relationship among assessment, instruction and monitoring student progress to include student performance measures in grading practices, the ability to construct and interpret valid assessments using a variety of formats in order to measure student attainment of essentials skills in standards-based environment, and the ability to analyze assessment data to make decisions about how to improve instruction and student performance. <u>It is essential that teachers be prepared in a balanced approach to assessment to include not only skills in assessment of learning but especially, assessments for learning principals and practices.</u></p> <p>Fullan (2001) has argued that eliminating the achievement gap will require the mobilization of the teacher workforce around assessment literacy. Today, that literacy means successfully transitioning from a primary focus on assessment of learning to a balanced literacy of assessment of learning <i>and</i> for learning. As Black and Wiliams (1998) have discussed, solid evidence has shown that formative assessment can raise standards of achievement, In the climate of high-stakes testing and accountability, assessment has become a key driver in school reform efforts. As our ideas about assessment have grown and adapted to the challenges of meeting the increasing demands of NNCLB and individual state standards, educators have advanced assessment from primarily summative to summative and formative. But as Stiggins (2006) has pointed out, in the current climate, formative assessment has sometimes taken on a narrow meaning, that is more frequently administered summative assessments to determine which students have not yet met standards – What Stiggins described as an “early warning system.” Opportunities for students and teachers to use assessment to make adjustments while still learning are rare in the climate of standards of learning, pacing guides, nine-week benchmark testing, and other pressures prominent in the precision climate schools now operate.</p> <p>An imbalanced notion of assessment, with a primary, or even exclusive focus on the assessment of learning is a significant danger to school improvement and student learning. Working harder within the confines of the current thinking about assessment quickly bumps into the functional limitations of a narrow or imbalanced notion of assessment. As Wergin (2003) asserts, <i>you become what you measure</i>, and this could not be truer then [sic]</p>

Date	Name	Title and Organization	Instructional Design Based on Assessment Data
			<p>in the case of standards-based assessments. Chasing the measure, or what has been deferred to as “goal displacement” (Blau & Scott, 1962), runs the risk of underestimating the need to teach the higher-order cognitive skills widely recognized as being necessary for advancement to upper level courses and as a fundamental life skills in today’s complex society. A primary focus on teaching to the test can take the life out of school programs and deflect teaching from its real purposes and from the real intent of the State Standards of Learning.</p> <p>Our recent research with schools, showing 25 percent increases for regular education students and 35 percent increases for special education students on the SOLs, is consistent with the extensive research literature that shows significant changes in student learning as the result of using effective formative and assessment for learning practices. Our experiences in working with school personnel also show that it is difficult to change fundamental perspectives on assessment without explicit and continued attention to assessment for learning principals and practices. For that reason, we advocate strongly for an explicit emphases on the aspects of assessment literacy which we know will produce substantive and sustainable differences in student learning.</p>
11/29/2006	Lois H. Stanton	President Chesterfield Education Association	I also strongly support the inclusion of “classroom management” and “instructional design based on assessment data” as professional studies requirements. These are often the areas in which new teachers feel inadequately prepared for the reality of the classroom. Those who are better prepared are more likely to choose to continue teaching career.
11/29/2006	Jeff Cobb	Vice-President Virginia Education Association	Incoming teachers find their greatest challenges when attempting to manage the conduct of students and use assessment data to develop and deliver appropriate instruction. VEA supports the recommendation to require additional pre-service preparation in these areas.

Dating of Licenses

Date	Name	Title and Organization	Dating of Licenses
12/4/2006	Barbara Warren Jones	President – Tidewater Association of School Personnel Administrators – Region II	<p>On behalf of the Region II Tidewater Association of School Personnel (TASPA) membership, we present the following comments and concerns highlighting the prospective changes to licensure specifications and the serious impact that they will have on Virginia’s Region II school divisions if implemented.</p> <p>We strongly oppose changing to contractual dates for initial Provisional Licenses. The current licensure dates allow us to monitor teachers and maintain their licensure records. This change would undermine our ability to ensure accurate non-renewal tracking. Our teachers would have multiple expiration dates; the Code of Virginia has one non-renewal date – process completed by April 15. Only a single effective date makes that possible. It would be very difficult to track a floating date and have an accurate non-renewal process. We expend a great deal of energy ensuring that our teachers are notified of their requirements and upcoming non-renewal dates. Multiple expiration dates would diminish the effectiveness and efficiency of the process. It would also impact student learning if we have to terminate teachers due to licensure during the middle of the school year.</p>
12/7/2006	Thomas E. Bartosh	Licensure Specialist Virginia Beach City Public Schools	<p>On behalf of Virginia Beach City Public Schools Department of Human Resources, the items presented below are provided as public comments to the <i>Regulations Governing the Licensure of School Personnel</i>. We ask that this information be presented to the Virginia Board of Education for its consideration before final action is taken on these regulations.</p> <p>We oppose the following proposed revisions: 8VAC20-22-50 Types of licenses; dating of licenses. Concerning the requirement that all assessment exams must be completed within one year of the contractual date of employment, we feel that allowing multiple effective dates would:</p> <ul style="list-style-type: none"> • unnecessarily disrupt our students at irregular intervals • add stress to new teachers adjusting to new environment • impact our budget and increase our current workload <ul style="list-style-type: none"> - requiring that additional reporting capabilities be developed in our database to effectively monitor individual’s progress on a daily basis - requiring additional time, effort, and money to dismiss non-compliant teacher and recruit/staff a replacement
12/15/2006	Nancy L. Munden	Human Resources Licensure Analyst Hanover County Public	Changing the dating of provisional licenses will cause additional programming for reports and additional data entry, which is currently not necessary when

Date	Name	Title and Organization	Dating of Licenses
		Schools	communicating with employees concerning their licenses.
11/27/2006	Ann Maydosz	Adjunct Faculty Program Coordinator The Commonwealth Special Education Endorsement Programs: Alternative Licensure Through Distance Education (CSEEP) Old Dominion University	The CSEEP Advisory Board supports the proposal of dating the conditional license one year from the contractual date of employment.
09/19/2006	Debra Reader	Director, Employment Services Fairfax County Public Schools On behalf of the Region IV Human Resources Directors	<p>WE STRONGLY OPPOSE-</p> <ul style="list-style-type: none"> Multiple dates for initial Provisional license. The current licensure dates allow us to monitor thousands of teachers and maintain their licensure records. This change would undermine our ability to ensure accurate non-renewal tracking. Our teachers would have multiple dates; the Code of Virginia has one – process completed by April 15. Only a single effective date makes that possible. It would be very difficult to track a floating date and have an accurate non-renewal process that meets NCLB. We expend a great deal of energy ensuring that our teachers are notified of their requirements and upcoming non-renewal dates. Multiple effective dates would diminish the effectiveness and efficiency of the process.
12/5/2006	Shawn Finerty	Licensure Coordinator Fairfax County Public Schools	<p>Multiple dates for initial Provisional license. The current licensure dates allow us to monitor thousands of teachers and maintain their licensure records. This change would undermine our ability to ensure accurate non-renewal tracking. Our teachers would have multiple dates; the Code of Virginia has one – process completed by April 15. Only a single effective date makes that possible. It would be very difficult to track a floating date and have an accurate non-renewal process that meets NCLB. We expend a great deal of energy ensuring that our teachers are notified of their requirements and upcoming non-renewal dates. Multiple effective dates would diminish the effectiveness and efficiency of the process. <i>Also inherent with this system will be the fact that some teachers won't complete their testing requirements and the school division will be faced with many more "out of cycle" hiring actions.</i></p> <p>In addition, we suspect that this change would also require changes in programming at DOE as now dates are entered automatically. More importantly, if like</p>

Date	Name	Title and Organization	Dating of Licenses
			<p>FCPS where we hire so many teachers and approximately 40-50% of them require assessments of some kind, DOE will be, like the local school divisions, burdened with extending licenses an additional two years for those needing course work once the assessments are completed. With 132 public school divisions and substantially more accredited private schools, the workload across the board and cost of updated licensing could substantially increase. <i>Multiple effective dates would diminish the effectiveness and efficiency of the process.</i></p>

Changing Out-Of-State Exemption from Testing

Date	Name	Title and Organization	Changing Out-Of-State Exemption from Testing
12/4/2006	Barbara Warren Jones	President – Tidewater Association of School Personnel Administrators – Region II	<p>On behalf of the Region II Tidewater Association of School Personnel (TASPA) membership, we present the following comments and concerns highlighting the prospective changes to licensure specifications and the serious impact that they will have on Virginia’s Region II school divisions if implemented.</p> <p>We strongly oppose the switch from two years to three years of out-of-state experience for testing exemption. This will decrease our pool of out-of-state candidates who qualify for the “Virginia Assessment Exemption Criteria” and, without an adequate and timely transition period, our recruiting efforts would be greatly impacted. We recruit extensively out of state (at least 60%) because of the critical shortage here in Virginia.</p>
12/7/2006	Thomas E. Bartosh	Licensure Specialist Virginia Beach City Public Schools	<p>On behalf of Virginia Beach City Public Schools Department of Human Resources, the items presented below are provided as public comments to the <i>Regulations Governing the Licensure of School Personnel</i>. We ask that this information be presented to the Virginia Board of Education for its consideration before final action is taken on these regulations.</p> <p>We oppose the following proposed revisions: 8VAC20-22-100. Conditions for licensure for out-of-state candidates by reciprocity. Concerning the requirements for 3 years teaching experience vs. 2 years to exempt applicants from Virginia assessments, we feel that the requirement will negatively impact our out-of-state recruiting efforts. We suggest that Virginia keep the 2 year requirement in place and add the requirement that teachers hold a</p>

Date	Name	Title and Organization	Changing Out-Of-State Exemption from Testing
11/28/2006	Dr. Roger Morris	Assistant Superintendent Southampton County Schools	<p>valid out-of-state licenses at the time of their initial application.</p> <p>The purpose of this email is to provide public comment to the proposed regulations for licensure of professional personnel. First, you and your staff are to be commended for your efforts in revising the regulations. One particular improvement is the proposed change to allow one area of specialty for middle school.</p> <p>The number of years of teaching experience to exempt an individual from all professional teacher’s assessments has been increased from two to three years, and individuals also must hold a valid out-of-state license (full credentials with no deficiencies). Current regulations require two years of teaching experience and no out-of-state license. Again this would also seriously damage our recruiting efforts.</p>
12/15/2006	Nancy L. Munden	Human Resources Licensure Analyst Hanover County Public Schools	<p>I really think that teachers who have taught for two years out of state and are fully licensed out of state should be exempt from the professional teachers assessment requirements since they will have already taken the assessments required for that license.</p>
12/15/2006	Vince Indelicato		<p>With regards to 8VAC20-22-100.D., I am against the proposed change for out-of-state licensees to have completed three years of successful teaching experience (from the current two years) to be exempt from the professional assessment requirements. I believe that this is an arbitrary and unnecessary change which will serve to shrink the pool of qualified out-of-state teacher candidates. This is a candidate group which is being relied on more and more by school divisions across the state to meet Virginia’s teacher shortage. Any change to this exemption which would serve to harm teacher recruitment is a bad idea.</p>
12/15/2006	Dale Sander Marceline R. Catlett Elaine A. Garner	Superintendent Assistant Superintendent for Instruction and Personnel Supervisor of Personnel Services Fredericksburg City Public Schools	<p>We oppose the following proposed revision:</p> <p>8VAC20-22-100. <u>Switching from two years to three years of out-of-state experience for testing exemption.</u></p> <p>This change would have a significant negative impact on our out-of-state recruiting efforts. We would rather see it lowered and are definitely opposed to seeing it increased. We would recommend that if the teacher has a valid out-of-state license or even a provisional, based on meeting one year of teaching experience, at the time of their initial application and</p>

Date	Name	Title and Organization	Changing Out-Of-State Exemption from Testing
			<p>have passed the assessment requirements for that state, that the teacher should be exempted from all Virginia assessments.</p>
12/4/2006	<p>Starr Rowe</p> <p>Denise Hunt</p> <p>Eddie P. Antoine, II</p> <p>Eddie P. Antoine, II</p>	<p>Director of Human Resources Culpeper Public Schools</p> <p>Recruitment and Licensure Specialist Culpeper Public Schools</p> <p>President Virginia Association of School Personnel Administrators</p> <p>Assistant Superintendent Human Resources and Staff Support Newport News City Public Schools</p>	<p>8VAC20-22-100. Switching from two years to three years of out-of-state experience for testing exemption</p> <p>This change will negatively impact our out-of-state recruiting effort. Most states have assessment requirements that teachers already meet. Additionally, under HOUSSE teachers are considered “veteran” teachers after one year of experience. We would recommend that Virginia keep the two-year rule in place and add the requirement that teachers hold a valid out-of-state license at the time of their initial application.</p>
8/9/05	Stephen L. Herbert		<p>I believe out of state teachers should be held to the same high standards as in state teachers (Praxis I). Give them the same consideration you give new hires in Virginia- a one year provisional license and they must meet the Virginia standards for assessment testing as well.</p>
11/29/2006	Jeff Cobb	Vice-President Virginia Education Association	<p>We agree with exempting fully licensed teachers with 3 years of successful teaching experience in other states from additional tests. These professionals have a proven track record, and we may lose their benefit to our students if such teachers decide to bypass Virginia for other states.</p>
12/7/2006	Ida Ostrowski	Licensure Specialist York County Public Schools	<p>In opposition: 8VAC20-22-100 Changing out of state experience from two years to three years Keeping the two year minimum of successful teaching experience is more closely aligned to the HOUSS requirements which indicate that an experienced teacher is a teacher who has taught for one year. We recommend that the two-year requirement stay in place with the requirement that teachers hold a valid out-of-state license at the time of the initial application, or have completed a teacher preparation programs and has two years teaching experience.</p>
12/15/2006	<p>Larry E. Shobe</p> <p>John Linaburg</p> <p>Katherine</p>	<p>Executive Director of Human Resources</p> <p>Assistant Director of Human Resources</p> <p>Licensure Analyst</p>	<p>8VAC20-22-100 Switching from two to three years out-of-state experience for testing exemption This change will negatively impact our out-of-state recruiting efforts. A large number of our new hires for the 2006-2007 school year were from out of state. Most states have assessment requirements that teachers already meet. We would recommend that</p>

Date	Name	Title and Organization	Changing Out-Of-State Exemption from Testing
	Funkhouser		Virginia keep the two-year requirement in place and add the requirement that teachers hold a valid out-of-state license at the time of their initial application.
11/30/2006	Beverly Baker	Compliance Officer Prince William County Public Schools	8VAC20-22-100. Conditions for licensure for out-of-state candidates by reciprocity. (Page 14D.) Changing the minimum years of teaching experience from two years to three years to be exempted from the professional teachers' assessment requirements would greatly reduce our out-of-state applicant pool and out-of-state recruiting incentives.
9/19/2006	Shawn Finerty Debra Reader	Licensure Coordinator Fairfax County Public Schools Director, Employment Services Fairfax County Public Schools On behalf of the Region IV Human Resources Directors	We strongly oppose: The switch from two years to three years of out-of-state experience for testing exemption. This will decrease our pool of out-of-state candidates who qualify for the "Virginia Assessment Exemption Criteria" and, without an adequate and timely transition period, our recruiting efforts would be greatly impacted.
11/27/2006	Stephen C. Jones	Superintendent Norfolk Public Schools	This letter serves as my feedback to the proposed revisions to the Regulations Governing the Licensure of School Personnel. Norfolk Public Schools struggles to manage the hardships it experiences in teacher staffing. Due to the limited number of Virginia teacher graduates, the regional competition for these graduates, and the teacher turn over rate in a large urban school division, Norfolk Public Schools experiences a teacher shortage. As a result, the school division must hire approximately 50 percent of its 350 teachers hired annually from out of state. The testing requirements unique to Virginia further complicate hiring teachers from out of state. Two of the proposed revisions to the Regulations Governing the Licensure of School Personnel would create further teacher staffing hardships for the school division. Based on the rationale provided above, the following recommendations are made: I am not in support of 8VAC20-22-100/D: Individuals who hold a valid out-of-state license (full credential with (out) no deficiencies) and who have completed a minimum of three years of full-time successful teaching experience in a public or accredited nonpublic school (kindergarten through grade 12) in a state other than Virginia are exempted from the professional teacher's assessment requirements. Instead, I recommend: Individuals who hold a valid out-of-state license and who have completed a minimum of two years of full-time teaching experience in a public or

Date	Name	Title and Organization	Changing Out-Of-State Exemption from Testing
			<p>accredited nonpublic school (kindergarten through grade 12) in a state other than Virginia are exempted from the professional teachers assessment requirements.</p>

Requiring All Testing in First Year of Provisional License

Date	Name	Title and Organization	Requiring All Testing in First Year of Provisional License
12/4/2006	Barbara Warren Jones	President – Tidewater Association of School Personnel Administrators – Region II	<p>On behalf of the Region II Tidewater Association of School Personnel (TASPA) membership, we present the following comments and concerns highlighting the prospective changes to licensure specifications and the serious impact that they will have on Virginia’s Region II school divisions if implemented.</p> <p>We strongly oppose one year provisional (and</p>

Date	Name	Title and Organization	Requiring All Testing in First Year of Provisional License
			<p>conditional) licenses eligible for renewal if testing requirements are met the first, provisional licenses can be extended to year two. Our best estimate is that we, as a region, may be requesting thousands of extensions per year if they are renewed yearly; half that if extended once. Districts may require Praxis II by March of the first year. Also districts may require on hiring documents that VCLA and VRA must be met by March 1 of the third year of the Provisional License or third year of VA employment.</p>
11/28/2006	Dr. Roger Morris	Assistant Superintendent Southampton county Schools	<p>The purpose of this email is to provide public comment to the proposed regulations for licensure of professional personnel. First, you and your staff are to be commended for your efforts in revising the regulations. One particular improvement is the proposed change to allow one area of specialty for middle school.</p> <p>There are two issues of concern that are proposed in the licensure regulations:</p> <p>1. Individuals must complete the professional teacher’s assessments within one full school year of the contractual date of employment. This means we will release teachers throughout the year if assessments are not met. ETS does not offer enough testing dates for the assessments to accommodate new hires throughout the year in order to meet the requirements. Being a border county, Southampton relies on hiring out-of-state candidates. This change would seriously damage our recruiting efforts.</p>
12/1/2006	Eddie P. Antoine, II	President Virginia Association of School Personnel Administrators (VASPA)	<p>On behalf of the Virginia Association of School Personnel Administrators (VASPA), the items presented below are provided as public comments to the <i>Regulations Governing the Licensure of School Personnel</i>. I regret that I cannot attend the sessions as the VASPA membership is convening in Charlottesville, December 5-8, 2006, at its annual fall conference. We ask that this information be presented to the Virginia Board of Education for its consideration before final action is taken on these regulations.</p> <p>We oppose the following proposed revisions: 8VAC20-22-40. Completion of the Professional Teacher’s Assessment and Dating of Provisional Licenses. Although completion of the required</p>

Date	Name	Title and Organization	Requiring All Testing in First Year of Provisional License
12/15/2006	Vincent Indelicato		<p>I am writing you today to provide my comments on the Proposed Regulations Governing the Licensure of School Personnel. I wish to make clear that my comments represent my personal views on these proposed regulations only and do not necessarily reflect the views of any other person or entity.</p> <p>With regards to 8VAC20-22-50 A.1., I am not in favor of the change in licensure dating and time periods reflected in this section. I believe that giving new provisional license holders only one year to complete the professional testing requirements is both unfair to the license holder as well as could potentially cause greater turnover or teacher shortages in the classroom. Currently the Virginia Communications and Literacy Assessment and Virginia Reading Assessment tests have only six administrations a year and the Praxis II tests have only seven. Functionally, with score reporting timelines, this leaves only a few relevant test administrations that could be attempted by a license holder with the assurance that official score reports would be obtained in the time frame needed. In addition, these tests are not inexpensive, so a first year teacher under this scenario would need to pay for these tests over the course of one year instead of the three years that they currently have.</p> <p>With only one year to pass these tests, instead of the current three, I can also foresee that school divisions will be wary of hiring Provisional License holders who still need to meet the testing requirements, as the division cannot guarantee that the teacher will pass the tests within that first year. This could lead to an excessive number of teacher vacancies in the classroom, or, if divisions hire these teachers, greater turnover if the teacher is not able to pass all of the tests during that critical first year. Either situation is one that can be avoided by leaving the current time frame for passing the testing requirements alone.</p> <p>Finally, regarding this proposed section, I can foresee a licensure tracking nightmare on both the part of the school division and the Virginia Department of Education with the change of the license expiration date from the standard June 30 to a “floating” date that is tied to the contract date of the teacher. For divisions with a few dozen new Provisional License hires each year, this would be an inconvenience. For divisions with a few hundred new Provisional License hires a year, this could be a disaster in the making. In addition, the proposed section does not make clear whether the additional two years that the Provisional License holder receives are based off of the contract date of the</p>

Date	Name	Title and Organization	Requiring All Testing in First Year of Provisional License
			teacher or if the license reverts back to the standard June 30 expiration date.
12/15/2006	Dale Sander Marceline R. Catlett Elaine A. Garner	Superintendent Assistant Superintendent for Instruction and Personnel Supervisor of Personnel Services Fredericksburg City Public Schools	<u>We oppose the following proposed revisions:</u> 8VAC20-22-40. <u>Completion of the Professional Teacher’s Assessment and Dating of Provisional Licenses.</u> We concur with the thoughts of Eddie P. Antoine, II, President, Virginia Association of School Personnel Administrators (VASPA), that completion of the required assessments in one year is a most desirable goal but that based on experience and too many uncontrollable variables this is not always possible for new teachers. We also concur that changing the current licensure dating policy would make it very difficult for database tracking purposes and would increase the school division’s workload.
10/19/2006		State Special Education Advisory Committee (SSEAC)	The SSEAC endorses the proposal that for the purposes of Provisional Licensure all state required tests be passed during the first year of licensure.
11/27/2006	Ann Maydosz	Adjunct Faculty Program Coordinator The Commonwealth Special Education Endorsement Programs: Alternative Licensure Through Distance Education (CSEEP) Old Dominion University	Regarding meeting all testing requirements in the first year of licensure for a provisionally licensed teacher, the CSEEP Advisory Board felt that the VRA should be required in the first 2 years as passing it necessitates taking one to two courses on the methods of teaching reading.
12/4/2006	Starr Rowe Denise Hunt Eddie P. Antoine, II Eddie P. Antoine, II	Director of Human Resources Culpeper Public Schools Recruitment and Licensure Specialist Culpeper Public Schools President Virginia Association of School Personnel Administrators Assistant Superintendent Human Resources and Staff Support Newport News City Public Schools	<u>We oppose the following proposed revisions:</u> <ul style="list-style-type: none"> <li data-bbox="917 1281 1429 1375">8VAC20-22-40. Completion of the Professional Teacher’s Assessment and Dating of Provisional Licenses <p>Although completion of the required assessments in one year is a desirable goal, the reality is that, based on a variety of factors, it is often not possible. In addition, the current licensure dating policy allows us to monitor all our teachers and effectively manage our database. A change to allow dating of licensure based upon the hiring date would adversely affect our database for non-renewal tracking. The Code of Virginia has one date-a process completed date of April 15. A single effective date makes that possible. It would be very difficult to track a floating date, have an accurate non-renewal process, and most importantly, to find out-of-cycle replacements for the non-renewed teachers. Multiple effective</p>

Date	Name	Title and Organization	Requiring All Testing in First Year of Provisional License
			<p>dates would greatly increase both the school divisions and Department of Education's workload. In addition, SPED and elementary teachers are required to pass Praxis and VRA. In the past there was no cut score for the VRA, and this was not a problem, but now with the cut score, teachers should not be taking the VRA assessment until they have taken the language acquisition and reading requirement. These classes may not have been offered and taken during the first year of employment.</p>
12/5/2006	Dr. Mike Behrmann	Professor of Special Education at George Mason University	Opposed to having professional assessment completed in first year of provisional teaching.
8/9/05	Stephen L. Herbert		<p>I do not agree with the reduction of the provisional status from three years to one year. Most teachers granted provisional status are fresh out of college and are required by most school systems to participate in new teacher orientation programs that can require many after school hours...(new teachers do not have enough time to prepare for assessments in just one year)</p>
12/7/2006	Ida Ostrowski	Licensure Specialist York County Public Schools	<p>In opposition:</p> <p>8VAC20-22-40 All candidates must complete the professional teacher's assessments within one year of the contractual date of employment</p> <p>One year does not give teachers who need multiple tests enough opportunities to meet this obligation for contract renewal. Teachers who come from out-of-state, seeking Elementary endorsement or Special Education endorsement may need as many as 3 tests. And there is no room for retesting if needed.</p> <p>Using a contractual date instead of the current licensure dates will be difficult to monitor with these contractual dates occurring throughout the year. Without test scores at the time of contract renewal, the result will most likely be dismissal of the teacher. Finding replacements for those who do not meet the contractual date places a heavy burden on the personnel department which is already heavily laden.</p>
12/15/2006	<p>Larry E. Shobe</p> <p>John Linaburg</p> <p>Katherine Funkhouser</p>	<p>Executive Director of Human Resources</p> <p>Assistant Director of Human Resources</p> <p>Licensure Analyst</p>	<p><u><i>We oppose the following revisions:</i></u></p> <p>8VAC20-22-40 Completion of the Professional Teacher's Assessment and Dating of Provisional License</p> <p>Completion of the required assessments in one year is desirable; however, based on a variety of factors, it is often not possible. The current licensure dating policy allows us to monitor all our teachers and effectively manage our data base. It would be very</p>

Date	Name	Title and Organization	Requiring All Testing in First Year of Provisional License
			<p>difficult to track a floating date, have an accurate non-renewal process (completed by April 15), and most importantly, to find out-of-cycle replacements. Multiple effective dates would diminish the effectiveness and efficiency of the process.</p>
11/30/2006	Beverly Baker	Compliance Officer Prince William County Public Schools	<p><u>PWCS does not support the following proposals:</u></p> <p>8VAC20-22-50. Types of licenses; dating of licenses. (Page 5 Section A. and Page 8 Section B.) The proposed changes for the provisional license holder who has not met assessment requirements indicates that the license will be issued for one year from the contractual date of employment. Upon meeting the testing requirements in the first year of the license, the license may be extended for two years. The proposal does not indicate whether the extended license will continue to be issued based on the contractual date of hire or July 1 of the year in which the license holder meets the assessment requirements- more clarification is needed to give a proper response. We are in support of allowing license holder of a full three years from the contractual date of hire to meet licensure requirements. The tracking of multiple dates and the efficiency of licensure processes will be greatly affected by floating licensure dates. Additionally, PWCS would be required to process hundreds of additional licensure extensions per year. Perhaps the guidelines should convey that a license holder has a full three years from the contractual date of hire to meet all licensure requirements and school divisions can request on an as-needed basis a license extension based on the contractual date of hire. Completing assessment requirements within one year of contractual date of hire should be tracked and maintained by school divisions in the same manner as the Educational Technology requirements are maintained.</p>
09/19/2006	Shawn Finerty Debra Reader	Licensure Coordinator Fairfax County Public Schools Director, Employment Services Fairfax County Public Schools On behalf of the Region IV Human Resources Directors	<p>The return to a first year requirement for VCLA/VRA (if needed) Fairfax County Public Schools (FCPS) had complied with this mandate until this year and then switched to the current state guidelines. Although other Region IV districts have not issued this mandate thus far, making repeated changes diminishes our credibility with our new employees and increases anxiety among our employees. In a time during which teacher availability is in crisis, why would we implement yet another change?</p> <p>One year provisional and conditional licenses eligible for renewal if testing requirements are met the first year, provisional license can be</p>

Date	Name	Title and Organization	Requiring All Testing in First Year of Provisional License
			<p>extended to year two – Our best estimate is that we, as a region, may be requesting thousands of extensions per year if they are renewed yearly; half that if extended once. We already require Praxis II by March of the first year. All of current hiring documents state that VCLA and VRA must be met by March 1 of the third year of the Provisional License or third year of VA employment. If there is no grandfather period, we would have newly hired teachers with changing expectations.</p>
11/27/2006	Stephen C. Jones	Superintendent Norfolk City Public Schools	<p>I am also not in support of the bolded portion of 8VAC20-22-50/A/1: Provisional License: the Provisional License is a nonrenewable license valid for a period not to exceed three years issued to an individual who has allowable deficiencies for full licensure as set forth in these regulations. The individual must have a minimum of an undergraduate degree from an accredited [SIC] college or university (with the exception of those individuals seeking licensure through a career switcher program, will be issued for three years if all testing requirements prescribed by the Board of Education have been completed. If the individual has not met testing requirements prescribed by the Board of Education, the license will be issued for one year from the contractual date of employment. Upon meeting the testing requirements in the first year of the license, the license may be extended for two years. Individuals must complete the requirements for the regular, five-year license within the validity period of the provisional license.</p> <p>Instead, I recommend: ...If the individual has not met testing requirements prescribed by the Board of Education, the individual must show progress annually through the submission of the score reporting sheet(s). Failure of the individual to show progress annually, will result in termination of the three year provisional license.</p> <p>In order to meet the educational needs of the students of Norfolk Public Schools, we must be able to attract and retain high quality teachers. To increase the number of years of experience for out-of-state teacher applicants and to change the conditions of the provisional license would create an additional hardship on a teacher staffing for Norfolk Public Schools.</p>

School Manager License

Date	Name	Title and Organization	School Manager License
12/4/2006	Barbara Warren Jones	President – Tidewater Association of School Personnel Administrators – Region II	<p>On behalf of the Region II Tidewater Association of School Personnel (TASPA) membership, we present the following comments and concerns highlighting the prospective changes to licensure specifications and the serious impact that they will have on Virginia’s Region II school divisions if implemented.</p> <p>We support the School Manager License – licensed to administer non-instructional responsibilities in an educational setting. This could be utilized locally.</p>
9/19/2006	Shawn Finerty Debra Reader	<p>Licensure Coordinator Fairfax County Public Schools</p> <p>Director, Employment Services Fairfax County Public Schools</p> <p>On behalf of the Region IV Human Resources Directors</p>	<p>We support:</p> <p>School Manager License. Licensed to administer non-instructional responsibilities in an educational setting.</p>

Single Endorsement for Middle School Teachers

Date	Name	Title and Organization	Single Endorsement for Middle School Teachers
12/4/2006	Barbara Warren Jones	President – Tidewater Association of School Personnel Administrators – Region II	<p>On behalf of the Region II Tidewater Association of School Personnel (TASPA) membership, we present the following comments and concerns highlighting the prospective changes to licensure specifications and the serious impact that they will have on Virginia’s Region II school divisions if implemented.</p> <p>We support Middle School endorsements change from two endorsements to one. This would actually enhance our recruitment efforts.</p>
12/7/2006	Thomas E. Bartosh	Licensure Specialist Virginia Beach City Public Schools	<p>On behalf of Virginia Beach City Public Schools Department of Human Resources, the items presented below are provided as public comments to the <i>Regulations Governing the Licensure of School Personnel</i>. We ask that this information be presented to the Virginia Board of Education for its consideration before final action is taken on these regulations.</p> <p>We support the following proposed revisions: 8VAC20-22-160. Middle Education 6-8. We strongly support revising the requirement from two areas of concentration to one area of concentration. We feel this will enhance our flexibility in hiring qualified applications from both Virginia and other states. When combined with the option of adding endorsements via testing, this change will have a positive impact on staffing difficulty positions in middle school areas.</p>
11/28/2006	Dr. Roger Morris	Assistant Superintendent Southampton County Schools	<p>The purpose of this email is to provide public comment to the proposed regulations for licensure of professional personnel. First, you and your staff are to be commended for your efforts in revising the regulations. One particular improvement is the proposed change to allow one area of specialty for middle school.</p>
12/15/2006	Vince Indelicato		<p>With regards to 8VAC20-22-160, I am definitely in favor of changing the concentration area requirements for Middle Education 6-8 from concentrating in two areas to concentrating in one. I believe that this will definitely aid school divisions in filling critical middle school teaching openings. However, I do see the potential for confusion with this section because, unlike the current regulations in 8VAC20-21-150, 8VAC20-22-160 does not specify for each of the four major content areas what the “non-concentration” requirement is. I believe that this “non-concentration” semester hour requirement should also be denoted in 8VAC20-22-160, so that</p>

Date	Name	Title and Organization	Single Endorsement for Middle School Teachers
			there is no confusion among licensees and licensure personnel what the exact requirement for the “non-concentration” academic areas is.
12/15/2006	Dale Sander Marceline R. Catlett Elaine A. Garner	Superintendent Assistant Superintendent for Instruction and Personnel Supervisor of Personnel Services Fredericksburg City Public Schools	We strongly support the following proposed revision: 8VAC20-22-160. <u>Middle School endorsements may be issued with at least one area of concentration.</u> Passing of this option will give all school divisions more hiring flexibility for difficult to fill middle education areas. It is often hard to find candidates with enough course work for two areas of concentration, which leaves an untapped resource of good candidates with one area of concentration for the middle school grades. This change would most definitely have a positive impact on recruiting for the middle education positions.
12/4/2006	Starr Rowe Denise Hunt Eddie P. Antoine, II Eddie P. Antoine, II	Director of Human Resources Culpeper Public Schools Recruitment and Licensure Specialist Culpeper Public Schools President Virginia Association of School Personnel Administrators Assistant Superintendent Human Resources and Staff Support Newport News City Public Schools	We support the following revision: 8VAC20-22-160. Middle School endorsements may be issued with at least one area of concentration This option provides school divisions more hiring flexibility for difficult to fill middle education areas. In addition, out-of-state candidates who hold single middle school endorsements on their licenses who have previously been denied a license in that area because they did not hold a second area of concentration will now be eligible to receive the license. When coupled with the proposed testing-out option, this change will have a positive impact on filling middle education positions.
12/1/2006	Dr. John R. Goss, III Dr. H. Jurgen Combs Dr. Pam Stockinger Dr. Larry Brooks	Associate Dean for Graduate Studies Director, Teacher Licensure Director, Master’s in Teaching Program Director, Master’s in Administration Program Shenandoah University	We support the following: Changing the requirements for middle level licensure will encourage more students to enter that critical field. The number of interested applicants has dropped dramatically since the inception of the two content area rule as well as the additional courses in the two content areas not license.
9/20/2005	Sandra B. Cohen	Director, Teacher Education, Curry School of Education, UVA	8vac20-22-160 Middle Education: The proposal changes the requirement to one area of concentration with at least 21 semester hours and “minimum requirements” for the other core academic areas.

Date	Name	Title and Organization	Single Endorsement for Middle School Teachers
			However, there are no guidelines for defining minimum requirements leaving the area open for interpretation. Greater specificity is needed.
12/7/2006	Ida Ostrowski	Licensure Specialist York County Public Schools	<p>In strong support:</p> <p>8VAC20-22-160 Middle education 6-8 endorsement may be issued with at least one area of academic preparation</p> <p>This option will provide more hiring flexibility in middle education areas. Also, those who come from out of state with a single endorsement will now be eligible to acquire a license.</p>
12/15/2006	Larry E. Shobe John Linaburg Katherine Funkhouser	Executive Director of Human Resources Assistant Director of Human Resources Licensure Analyst	<p>8VAC20-22-160 Middle education 6-8</p> <p>The change of allowing one area of concentration on teaching licenses would enhance our recruitment efforts. This would not pose any problems.</p>
11/30/2006	Beverly Baker	Compliance Officer Prince William County Public Schools	8VAC20-22-160. Middle Education 6-8 (Page 22) Changing from requiring two concentrated areas to one concentrated area for Middle School Endorsement will enhance our recruiting pool for critical areas.
9/19/2006	Shawn Finerty Debra Reader	Licensure Coordinator Fairfax County Public Schools Director, Employment Services Fairfax County Public Schools On behalf of the Region IV Human Resources Directors	<p>We support:</p> <p>Middle School endorsements changing from two endorsements to one. This would actually enhance our recruitment efforts.</p>

Adding Endorsements By Testing

Date	Name	Title and Organization	Adding Endorsements By Testing
12/4/2006	Barbara Warren Jones	President – Tidewater Association of School Personnel Administrators – Region II	<p>On behalf of the Region II Tidewater Association of School Personnel (TASPA) membership, we present the following comments and concerns highlighting the prospective changes to licensure specifications and the serious impact that they will have on Virginia’s Region II school divisions if implemented.</p> <p>We support Test outs for adding endorsements. This will definitely enhance the areas for critical shortage needs.</p>
12/7/2006	Thomas E. Bartosh	Licensure Specialist Virginia Beach City Public Schools	<p>On behalf of Virginia Beach City Public Schools Department of Human Resources, the items presented below are provided as public comments to the <i>Regulations Governing the Licensure of School Personnel</i>. We ask that this information be presented to the Virginia Board of Education for its consideration before final action is taken on these regulations.</p> <p>We support the following proposed revisions: 8VAC20-22-70. Adding endorsements. We strongly support the ability to add endorsements by passing a rigorous academic subject assessment with the exception of Elementary Education. We feel that this revision is fair and equitable to all.</p>
8/3/2005 8/3/2005 8/3/2005 8/3/2005	Dr. Randall Thomas John F. Smith Morgan Phenix David Ponn	Superintendent, Page County Public Schools Assistant Superintendent for Human Resources, Page County Public Schools Principal, Page County High School Principal, Luray High School	<p>The proposal regarding the test-out option is overwhelmingly supported by the Page County Administrative Staff. It is our opinion that an individual who has a teaching license and passes the corresponding Praxis II content test for another content area should earn that endorsement. We support this proposal only on the secondary level.</p>
12/15/2006	Julia H. Cothron	President, Virginia Mathematics and Science Coalition	<p>First, the Coalition notes in the proposed amendments certain language responding to concerns regarding teacher shortages and establishing various alternative certification and endorsement routes intended to help</p>

Date	Name	Title and Organization	Adding Endorsements By Testing
			<p>address the shortages. The Coalition is, as you may know, keenly aware of this concern, which is especially acute in the areas of mathematics and sciences. We have worked hard to bring the concern about math and science teacher shortages to the fore and to address them in cooperation with the Department, Coalition member institutions, and other interested parties. We note in particular language in the proposed amendment to 8 VAC 20-22-70 allowing a teacher to take and pass a “rigorous academic subject test” to add an endorsement in the subject area of that test to their current license. Because teachers may seek to use this alternative route to add an endorsement in a math or science subject area, the content, scope, and use of such a test are of great interest to the Coalition. To ensure that teachers obtaining endorsements in this manner are competent in the subject area topic itself and associated pedagogy/teaching skills (and even laboratory safety for certain science subjects), the Coalition believes that the Department should carefully evaluate how such tests should be structured and implemented. The Coalition stands ready to offer its assistance to the Department during its evaluation and as the Department develops any associated regulation or any related agency guidance concerning the type, scope, and implementation of such tests.</p> <p>Second, as you may also know, the Coalition develops and implements projects with a focus on developing teachers with strong content pedagogical knowledge (as supported by research and as implemented in mathematics specialist program curricula we have developed). We urge the Department to consider, in the implementation of the proposed amendments if adopted, how best to ensure that subject-based curriculum and instruction courses are offered and taken by teachers and would-be teachers. In this manner, they can be trained how to teach that particular subject, so that they have the needed skills for that subject. Generic curriculum and instruction skills courses do not lead to this desired result nearly as well as subject-specific courses. Again, the Coalition would be happy to work with the Department in this regard as it develops guidance or implementing regulations in this area based on the proposed amendments.</p>
12/15/2006	Vincent Indelicato		<p>With regards to 8VAC20-22-70, I believe that allowing additional endorsements to be added in the manner outlined in this section is long overdue. Teachers who pass the rigorous academic subject test in an area for an added endorsement certainly will have demonstrated knowledge of that subject sufficient enough to teach courses in that subject area.</p>

Date	Name	Title and Organization	Adding Endorsements By Testing
			I believe that this provision will go a long way to solving some of staffing issue needs that arise in school systems for the hard to fill endorsement areas.
11/28/2006	Vicky Hayes		I am in favor of initiative 8VAC20-22-70.
11/28/2006	Kevin Johnson		I am in favor of initiative 8VAC20-22-70.
11/29/2006	Denise Fultz		I am in favor of initiative 8VAC20-22-70. Please pass this initiative.
11/30/2006	Denise Collins		I am in favor of the initiative 8VAC20-22-70. I am currently a special education teacher and have been in an inclusion or self-contained Algebra I class for the past 4 years. I would love to add on an Algebra I endorsement to my current special education certification, especially since I have 4 years of teaching experience in this subject.
12/15/2006	Dale Sander Marceline R. Catlett Elaine A. Garner	Superintendent Assistant Superintendent for Instruction and Personnel Supervisor of Personnel Services Fredericksburg City Public Schools	<u>We strongly support the following proposed revisions:</u> 8VAC20-22-70. <u>Add an additional endorsement to the license by passing a rigorous academic subject assessment.</u> We strongly support this option as we feel that our currently employed teachers should be given the same flexibility that individuals going through the Experiential Learning Credits Program are awarded. This would make the system more equitable to all. We also support the fact that this option not be opened to the elementary education endorsement areas.
3/7/2005	Stephanie Dearing	Executive Director for Human Resources Rockingham County Public Schools	Overwhelmingly, this proposal is supported. It is my opinion that an individual who has a teaching license and passes the corresponding Praxis II content test for another content area, should earn that endorsement. (This is a secondary, not elementary issue in my opinion. Only content areas should be included.) I do not believe that the cut score for the testing-out option should be any higher than for the traditional route teacher. I also do not believe that the areas must be related. What a wonderful manner in which to finally assist school divisions in dealing with scheduling issues that have plagued us for years!! This would truly be a move that would be beneficial to divisions and to teachers. Furthermore, if an individual has a bachelor's degree in an endorsable area, and qualifies for a provisional in that area, he/she should also be allowed to qualify for the provisional in another area in which he/she passes the content Praxis II.
12/4/2006	Starr Rowe Denise Hunt	Director of Human Resources Culpeper Public Schools Recruitment and Licensure Specialist	<u>We support the following revisions:</u> 8VAC20-22-70. <u>Add an additional endorsement to the license by passing a rigorous academic subject assessment</u>

Date	Name	Title and Organization	Adding Endorsements By Testing
	<p>Eddie P. Antoine, II</p> <p>Eddie P. Antoine, II</p>	<p>Culpeper Public Schools</p> <p>President Virginia Association of School Personnel Administrators</p> <p>Assistant Superintendent Human Resources and Staff Support Newport News City Public Schools</p>	<p>We wholeheartedly support this option. This change will align procedures for all teachers as currently this option is only open to those meeting the Experiential Learning Credits Program requirements. It will make the system fair and equitable to all. We also support the fact that this option not be opened to the elementary education endorsement areas.</p>
<p>9/20/2005</p>	<p>Sandra B. Cohen</p>	<p>Director, Teacher Education, Curry School of Education, UVA</p>	<ul style="list-style-type: none"> 8VAC20-22-70 Additional Endorsements: The proposal that licensed teachers may add an endorsement by passing a specified rigorous test needs to be more clearly developed...The test-in option discredits the established content specific pedagogy of a discipline...This proposal would mandate that we develop and maintain continuous administrative structures to respond appropriately within a 30 day limit and as a result would be burdensome for our faculty and staff.
<p>12/7/2006</p>	<p>Ida Ostrowski</p>	<p>Licensure Specialist York County Public Schools</p>	<p>In strong support:</p> <p>8VAC20-22-70 Add on additional endorsements to the licensure by passing a rigorous academic subject test</p> <p>Since this option has been give to those in the Career Switcher program, it is only fair that this option be given to all teachers.</p>
<p>12/15/2006</p>	<p>Larry E. Shobe</p> <p>John Linaburg</p> <p>Katherine Funkhouser</p>	<p>Executive Director of Human Resources</p> <p>Assistant Director of Human Resources</p> <p>Licensure Analyst</p>	<p>8VAC20-22-70 Add an additional endorsement to the license by passing a rigorous academic subject assessment</p> <p>We strongly support this option with the exception that it not be an option to add the elementary education endorsement.</p>
<p>11/30/2006</p>	<p>Beverly Baker</p>	<p>Compliance Officer Prince William County Public Schools</p>	<p>8VAC20-22-70. Additional endorsements. (Page 9) Individuals who hold a teaching license may add an additional endorsement to the license by passing a rigorous academic subject test would greatly enhance our applicant pool and allow current license holders to be eligible for multiple endorsement areas.</p>
<p>9/19/2006</p>	<p>Shawn Finerty</p> <p>Debra Reader</p>	<p>Licensure Coordinator Fairfax County Public Schools</p> <p>Director, Employment Services</p>	<p>We support:</p> <p>Test outs for adding endorsements. We do not support this concept for the elementary endorsement due to the nature of the elementary program of studies, but we do support for other subject areas.</p>

Date	Name	Title and Organization	Adding Endorsements By Testing
		Fairfax County Public Schools On behalf of the Region IV Human Resources Directors	Experiential Learning Credits. This is a suggestion that we support it will be used in cases of exception and for critical fields.

Coursework Changes

Date	Name	Title and Organization	Coursework Changes
12/4/2006	Barbara Warren Jones	President – Tidewater Association of School Personnel Administrators – Region II	<p>On behalf of the Region II Tidewater Association of School Personnel (TASPA) membership, we present the following comments and concerns highlighting the prospective changes to licensure specifications and the serious impact that they will have on Virginia’s Region II school divisions if implemented.</p> <p>We support course work requirements for provisional licenses that may change for several endorsements. Again, as long as the new requirements are clearly articulated to school systems, we area able to adapt our procedures.</p>
12/4/2006	Starr Rowe Denise Hunt Eddie P. Antoine, II	Director of Human Resources Culpeper Public Schools Recruitment and Licensure Specialist Culpeper Public Schools President Virginia Association of	<p>8VAC20-22-130 through 500. Proposed content course requirements and endorsement name changes</p> <p>These paragraphs provide changes in content course requirements, professional studies, and name changes to a variety of endorsements. We support all the proposed revisions with one minor request. Paragraph 370 refers to the health and physical education endorsement area. The</p>

Date	Name	Title and Organization	Coursework Changes
	Eddie P. Antoine, II	School Personnel Administrators Assistant Superintendent Human Resources and Staff Support Newport News City Public Schools	recommendation for anatomy, physiology and kinesiology is to change that requirement of 12 semester hours to 9-12 semester hours. It also recommends going from 6 semester hours of electives to 3-6 semester hours. I recommend that the hours be set at 9 and 6 respectively so as not to confuse those attempting to meet the requirements.
11/29/2006	Dr. Michael Davis	Department of Teaching and Learning School of Education Virginia Commonwealth University	<i>Item #180—Proposal to require three additional hours in classroom management and reading.</i> VCU faculty seek clarification on this proposal. While VCU faculty support increased attention to both classroom management and reading in the preparation of teachers, we are unclear about how this proposal will affect approved teacher preparation programs. To what extent will this new proposal apply to approved programs? If the state expects colleges and universities to add new courses to their approved programs, this will have significant staffing implications for VCU and other teacher preparation institutions.
11/27/2006	Ann Maydosz	Adjunct Faculty Program Coordinator The Commonwealth Special Education Endorsement Programs: Alternative Licensure Through Distance Education (CSEEP) Old Dominion University	Regarding proposed course work to meet the professional studies requirements, the CSEEP Advisory Board felt that the 3 hours in classroom management should read behavior management instead.
11/20/2006	Dr. Timothy Reynolds		I am also very concerned with the Board's intention of regulating the profession's curriculum by requiring specific courses (classroom management) and attempting to eliminate other (foundations and principles). Setting general guidelines is within the purview of an appointed policy committee but government and its agencies are not designed nor equipped to design a curriculum. Those are decisions best left to individuals who are practicing in the field and contributing to its intellectual capital. For a state agency to regulate curriculum is not only an act of excessive government intrusion and probably an infringement on academic freedom, it also ignores the experience and expertise of teachers and professionals working in K-12 schools and institutions of higher learning. I ask that you please demonstrate governmental restraint and recognize the profession's ability and right to create its own rigorous, coherent, and organized curriculum. Not only do the experts have the practical and theoretical knowledge necessary to accomplish the task, they have assumed an ethical

Date	Name	Title and Organization	Coursework Changes
			commitment to perpetuate and strengthen the profession and to ensure success for all students.
12/14/2006	Dr. Lisa Earp		I am also concerned with the Board’s intention of regulating the profession’s curriculum by requiring specific courses (classroom management) and attempting to eliminate other (foundations and principles). Course decisions are best left to individuals who are practicing in the field and contributing to its intellectual capital. I ask that you recognize the profession’s ability and right to create its own rigorous, coherent, and organized curriculum. Not only do the experts have the practical and theoretical knowledge necessary to accomplish the task, they have assumed an ethical commitment to perpetuate and strengthen the profession and to ensure success for all students.
11/30/2006	Dr. Brenda G. Gilman	Chair, Education Department Randolph-Macon College	Regarding classroom management as a separate course, we address classroom management as a very important topic directly in our two anchor courses which include structured observation of classroom management in field work. Additionally, in our methods courses, students study an array of theories and applications of effective classroom management models. We currently integrate classroom management across the professional educational studies courses and have met with great success. Student teachers and graduates of our program have sound understanding and application of classroom management. Our graduates, who are acknowledged as exemplary teachers in various venues, are recognized for outstanding instructional and classroom management practices.
12/11/2006	Dr. Lynn H. Wolf	Chair, Education Department Averett University	Education programs should be allowed to incorporate behavior management into other courses such as curriculum, instruction, and methods as we now do, and not be required to become a separate course. Behavior management must be taught throughout the program, in courses in which its relevance will make it the most meaningful. We have had excellent success doing it this way for many years and do not wish to alter a methods that already works so well. A decrease in the number of program hours of education coursework should not be required. We have a difficult time being able to include all the necessary requirements in the hours allowed under the current guidelines, and we feel strongly that a decrease in that number would seriously hinder the effectiveness of our education programs.
12/11/2006	James R. Amaral	President, District 9 Virginia Education Association	I would like to offer my support of changes that require the study of classroom management and instructional design based on assessment data as part of the professional studies requirements of Licensure

Date	Name	Title and Organization	Coursework Changes
			Code SVA20-22-130. Though this was part of my preparation when I was studying to be a classroom teacher in the elementary school, many new teachers are now reporting that they have been inadequately prepared to manage their classroom and design instruction based on assessed needs of students. This change would correct the problem.
11/29/2006	Lois H. Stanton	President Chesterfield Education Association	I also strongly support the inclusion of “classroom management” and “instructional design based on assessment data” as professional studies requirements. These are often the areas in which new teachers feel inadequately prepared for the reality of the classroom. Those who are better prepared are more likely to choose to continue teaching career.
12/14/2006	Dr. Brenda G. Gilman	President, VACTE	Lastly, requiring classroom management as stand alone course is not necessary since programs already address it by integrating it throughout teacher preparation. In integrating classroom management, teacher candidates fully recognize the importance of establishing clear classroom strategies in every aspect of teaching. Having classroom management relegated to a course, sends the message that it is indeed separate entity, when it is very much a necessary part of all that takes place in classrooms. The integration of classroom management reinforces the relationship between effective teaching and classroom management.
11/30/2006	Beverly Baker	Compliance Officer Prince William County Public Schools	8VAC20-22-130 Professional Studies Requirements.(Page 19) Changing the professional studies requirements for early/primary, elementary and middle Education is supported if there is a sufficient grace period for those individuals that have been working on meeting licensure requirements based on the current professional requirements.
9/19/2006	Shawn Finerty Debra Reader	Licensure Coordinator Fairfax County Public Schools Director, Employment Services Fairfax County Public Schools On behalf of the Region IV Human Resources Directors	We support: Course work requirements for provisional licenses may change for several endorsements. Again, as long as the new requirements are clearly articulated to school systems, we are able to adapt our procedures.

Career Paths to Teaching

Date	Name	Title and Organization	Career Paths to Teaching
12/7/2006	Thomas E. Bartosh	Licensure Specialist Virginia Beach City Public Schools	<p>On behalf of Virginia Beach City Public Schools Department the items presented below are provided as public comment on the proposed regulations for <i>Governing the Licensure of School Personnel</i>. We ask that you consider the comments presented to the Virginia Board of Education for its consideration. A decision is taken on these regulations.</p> <p>We oppose the following proposed revisions: 8VAC20-22-60 Licenses for Career Paths to Teaching. While we support professional growth and development for Career Teacher, we would experience an overwhelming number of teachers who would have to be designated to be equivalent of our internal Career Teacher. Virginia Beach City Public Schools "Career Teacher" incentive plan, implemented over 28 years ago, offers a limited monetary supplement to provide professional development above the continuing contract status. We feel that these designations would realistically benefit the individual teacher.</p>
11/29/2006	Lois H. Stanton	President Chesterfield Education Association	<p>I am pleased to see the designations for "Career Paths to Teaching" and the designations of <i>Career Teacher, Mentor Teacher, and Teacher Leader</i>. The importance of a career path for teachers who choose to remain in the classroom throughout their careers.</p>
11/29/2006	Jeff Cobb	Vice-President Virginia Education Association	<p>VEA has long encouraged efforts to create career paths to teaching to allow teachers to remain in the classroom, directly touching the lives of our children. The different proposed designations, career, mentor and leader, are all important. However, the most effective methods to retain quality professional staff in the classroom remain to raise Virginia's teacher salaries to an above-average level, in recognition of the above-average work being done in our schools; and further, to examine the negative aspects of school environments that make many teachers leave children behind. We support professional working conditions.</p>
12/15/2006	Larry E. Shobe John Linaburg Katherine Funkhouser	Executive Director of Human Resources Assistant Director of Human Resources Licensure Analyst	<p>8VAC20-22-60 Career Paths that reflect stages in the professional development of teachers</p> <p>Career paths are an excellent means to enhance the professional development of the teacher corps and provide teachers an additional means of professional growth. However, without monetary compensation it would make the career path meaningless to the teacher. Without adequate state funding, the proposal is not viable.</p>
9/20/2005	Sandra B. Cohen	Director, Teacher Education, Curry School of Education, UVA	<p>8 VA C20-22-60: Designation on Licensure for Career Paths to Teaching. Like the open-endedness of "nationally recognized certification," BOE..."</p>
12/11/2006	Cathy Kinzler, NBCT		<p>Under the proposed licensing changes, if a teacher is granted a Mentor Teacher license by one division's criteria, and moves to another division in Virginia whose criteria he/she does not meet at all, what happens to the license? Is it still viable until it comes up for renewal?</p> <p>I see all sorts of problems without uniform standards and procedures.</p>
12/4/2005	Starr Rowe	Director of Human Resources Culpeper Public Schools	<p>8VAC20-22-60. Career Paths that reflect stages in the professional development of teachers</p>

Date	Name	Title and Organization	Career Paths to Teaching
	Denise Hunt	Recruitment and Licensure Specialist Culpeper Public Schools	<p><u>We oppose this revision with comment.</u> Career means to enhance the professionalism of the teaching profession and provide teachers an additional means of progression. At the same time, progression without monetary incentives is such a proposal essentially meaningless to the profession. The divisions may have the funding to support career paths. However, many more are unable to address the requirements now making such a change inequitable. Without funding, I cannot support this proposal.</p>
	Eddie P. Antoine, II	President Virginia Association of School Personnel Administrators	
	Eddie P. Antoine, II	Assistant Superintendent Human Resources and Staff Support Newport News City Public Schools	
11/29/2006	Dr. Terry Dozier	Director of the Center for Teacher Leadership School of Education Virginia Commonwealth University	<p>My name is Terry Dozier. I am the Director of the Center for Teacher Leadership at Virginia Commonwealth University School of Education. I have worked with accomplished teachers throughout Virginia to promote and support them in order to improve teaching and learning.</p> <p>I am pleased to appear before you and provide public comment on the proposal to create career paths for teachers. I had the privilege of serving on the Committee to Enhance the K-12 Teaching Profession which was charged with developing a blueprint to enhance the teaching profession. The Committee released its report <i>Stepping up to the Plate... Virginia's Highly Qualified Teacher in Every Classroom</i> in October 2003. The Committee's recommendations was to "establish a multi-tiered system that reflects stages in the professional development of teachers and provides for continuing growth and career options as educators."</p> <p>At the request of the Division of Teacher Education and Learning of the Department of Education, our Center coordinated a Teacher Education Forum in 2003, to discuss the benefits, as well as the potential challenges of the Committee's recommendation and to provide as much input as possible on how the state should proceed if it decides to develop a new career path. The Forum was attended by more than 100 of the state's most accomplished teachers including local and state Teachers of the Year, Milken Educators Award Certified Teachers. Also in attendance were award winning principals, division administrators, personnel from the Virginia Department of Education, State Council of Higher Education and the Virginia Commonwealth University faculty and administrators from the state's teacher preparation programs, universities, and members of the Virginia Board of Education and other stakeholders.</p> <p>I am submitting with my written comments a copy of the report which summarizes the proceedings from the March 2003 Teacher Education Forum. The report includes an analysis of more than 60 hours of focus group discussions conducted over a two-day period, augmented by polling data from 100 participants using Group Interactive Feedback Technology, a real-time individual response system where individuals use hand-held devices to submit their individual, confidential responses to presented material. In particular, I want to call the Board's attention to two points:</p> <p>(1) Overwhelmingly, exemplary teachers in Virginia support the idea of creating a licensure system that differentiates teachers into multiple leadership roles. Ninety-two percent agreed with the concept of a licensure system, with 66 percent indicating that they strongly agreed.</p>

Date	Name	Title and Organization	Career Paths to Teaching
			<p>forum participants agreed with the concept of creating a v for master teachers or teacher leaders, with 45 percent stro believe these designations will provide increased credibili profession, strengthen support for teachers, and provide m</p> <p>In fact, the Forum participants supported different licenser teacher leaders, with the creation of a performance-based determine whether or not teachers could earn these new li proposal before the Virginia Board of Education to create teacher, and teacher as leader designation on the license d Forum participants recommended, it is a step in the right c</p> <p>(2) Virginia's accomplished teachers want objective sta knowledge, skills, and roles required for teacher leader</p> <p>local school divisions to determine eligibility for the ment leader designation is in direct conflict with the overwhel state's most exemplary teachers who believe the process o leaders "must be objective, above local politics, and consi</p> <p>Fifty-nine percent of forum participants believed that the a the candidate's school division. Only 17 percent felt that the teacher well should assess candidates for the Teacher l</p> <p>One reason National Board Certification is accepted and p the assessment process is valid, reliable, multi-faceted and nation. Candidates are identified only by an I.D. number and must demonstrate their ability to score a candidate's w alternative to National Board Certification for the Teacher must be objective and uniform in its application througho</p> <p>Uniformity and consistency is also important in terms of t designation. Current mentor guidelines say only that men quality and depth of mentor teacher training across the cor ranging from a few hours in some divisions to more than t others. The following paragraph from the <i>Report on the 2 Forum</i> summarizes the views of Virginia's most exemplar</p> <p><i>Forum participants repeatedly characterized current men school divisions as "buddy systems." To change this, men a consistent model. "Training must be standardized to gi "It has to be statewide, professional -- not the buddy syste carefully selected based on their knowledge, skills, and tre they need to be accountable. Effective mentoring program goals for each mentoring sessions. . .</i></p> <p>Virginia has adopted three mentoring models that meet the Santa Cruz, and Fairfax's New Beginnings. Therefore, th teachers to complete a local teacher training program to be teacher designation is in direct conflict with both the recor most exemplary teachers and the Virginia Department of I promote three high-quality mentoring programs.</p> <p>I hope that the Board's response to my remarks will mentor teacher and teacher as leader designati throughout the commonwealth want and need However, they also want and need assurances uniformity and consistency in how teachers ea</p>

Date	Name	Title and Organization	Career Paths to Teaching
12/15/2006	Vincent Indelicato		With regards to 8VAC20-22-60, I believe that having additional teaching licenses for "Career Paths to Teaching" is an excellent idea for teachers who already hold a Postgraduate Professional License. I believe that the categories were well thought out and add additional endorsements something to work towards in the future. I believe that the categories were well thought out and add additional endorsements something to work towards in the future. I believe that the categories were well thought out and add additional endorsements something to work towards in the future.
12/15/2006	Dale Sander Marceline R. Catlett Elaine A. Garner	Superintendent Assistant Superintendent for Instruction and Personnel Supervisor of Personnel Services Fredericksburg City Public Schools	8VAC20-22-60. Career Paths that reflect stages in the development of teachers. We again concur with the thoughts of the VASPA president that career paths to teaching is a wonderful additional means of recognizing the teaching profession but without adequate state funding this is a means of inequity between school divisions.
3/7/2005	Stephanie Dearing	Executive Director for Human Resources Rockingham County Public Schools	It is my opinion, and seems to be that of many of my peers, that a novice, career, mentor and lead teacher licensure system is not a system in place that designates the provisional, collegiate, postgraduate professional. Many (most!) divisions currently do not hold advanced degrees and the designation of National Board Certified. Inasmuch, the proposed change seems unnecessary. Additionally, these proposed additional designations would lead to confusion in a division's use of and assignments of the teachers holding these designations. As a principal and other HR professional I have addressed this issue. My initial response: "Where is the money coming from to fund these designations? even though this is presented as a proposal to recognize professional accomplishments, it is perceived as another means of monetary gain." A group of 50 HR directors/specialists who met with you in the fall of 2004, March 4, 2005, clearly indicated that we see this format of licensure and do not see the need to move from the current designation system.

Alternate Routes to Licensure

Date	Name	Title and Organization	Alternate Routes to Licensure
12/7/2006	Thomas E. Bartosh	Licensure Specialist Virginia Beach City Public Schools	<p>On behalf of Virginia Beach City Public Schools Department of Human Resources, the items presented below are provided as public comments to the <i>Regulations Governing the Licensure of School Personnel</i>. We ask that this information be presented to the Virginia Board of Education for its consideration before final action is taken on these regulations.</p> <p>We support the following proposed revisions: 8VAC20-22-90. Alternate routes to licensure. We strongly support the addition of the Experiential Learning methods to licensure. This will add significantly to the potential applicant pool.</p>
11/30/2006	Bob Wever	Coordinator of Middle and Secondary Science Frederick County Public Schools	<p>I have been reviewing the proposed changes to licensure regulations and I have a suggestion that I feel has merit. Currently a science teacher with a 7-12 endorsement in either Biology, Chemistry, Earth Science, or Physics may obtain an endorsement in another science discipline by completing a total of 18 semester hours (including specified courses) in that discipline. My recommendation is that this should be extended to teachers currently holding a middle school science endorsement as well.</p> <p>Those teachers are highly qualified professionals who have successfully completed at least 21 semester hours in science with at least one course from each of the core areas. Some would like the opportunity to teach at the high school level, but have difficulty in completing the 32 semester hours in Physics, Chemistry, Biology, or Earth Science required for endorsement. I see no real difference in an Earth Science teacher qualifying to teach Physics by taking an additional 18 hours in that discipline, than in a middle school science endorsed teacher doing so. Teachers holding the middle school science endorsement have a breadth of science knowledge and at least 21 semester hours in English, Math, or Social Studies which would allow them to make interdisciplinary connections in their high school, science classroom.</p> <p>I do not believe that quality of instruction would suffer if this proposal is accepted and I thank you for considering it.</p>
12/14/2006	Dr. Brenda G.	President, Virginia	On behalf of the collective membership of the Virginia

Date	Name	Title and Organization	Alternate Routes to Licensure
	Gilman	Association of Colleges of Teacher Educators (VACTE)	<p>Association of Colleges for Teacher Education (VACTE), which represents the 37 teacher preparation programs in colleges and universities in the state, I take this opportunity to respond to the proposed changes to the <i>Regulations Governing the Review and Approval of Education Programs in Virginia</i> and to the <i>Licensure Regulations for School Personnel</i>. As education professionals who are deeply committed to high quality teacher preparation, we have followed and discussed the effect these proposed changes will have on the preparation of future educators in our programs across the commonwealth. The following comments are offered:</p> <p style="padding-left: 40px;">2.) To maintain a high quality teaching force in Virginia, we strongly believe that all candidates entering the teaching profession, should be held to the same standards no matter the route to licensure. Current research (Darling-Hammond, et. al.) data indicate that those who come through alternative routes do not remain in teaching as long those out traditional programs. Standard accountability for teacher candidates will strengthen and retain our teaching force.</p>
12/5/2006	Dr. Donna H. Watson	Director of Teacher Education Bluefield College	<p>I have the opportunity to work with students at the college level who seek a teaching license in Virginia through a traditional program of majoring in an endorsement area, taking professional education courses, and participating in field experiences, to obtain a license. These students are assessed in a number of ways: through course work, through written application, through portfolios, class presentations, and projects, and finally, through a semester of student teaching. In addition, the students who seek a secondary license must have taken and passed three assessments: Praxis I, Praxis II, in their content area, and the Virginia Communications and Literacy Assessment. Students seeking a license to teach elementary school must take all of these tests, in addition to the Virginia Reading Assessment.</p> <p>What concerns me is the perception that alternate routes to obtaining a license are just as valid as the traditional route, and because they have fewer demands, students [sic] that avenue as more desirable. I had a student in my office today asking about Praxis II in Physical Education and Health. He dropped out of the Teacher Education pathway and had been advised by a teacher in the public school system to bypass the traditional program and pursue an alternate license by getting hired in a public school system and passing Praxis II.</p> <p>The traditional route to licensure through colleges and universities is much more accountable in terms of</p>

Date	Name	Title and Organization	Alternate Routes to Licensure
			<p>quality of the program and the individuals who obtain a license through it. The colleges and university programs have more requirements than do alternate programs such as Career Switcher programs or situations where individuals are hired and licensed through a school system.</p> <p>I am not advocating fewer requirements for traditional programs, but I am strongly in favor of the same high standards that are required of the traditional program to be implemented for all alternate routes.</p>
12/14/2006	Dr. Susan Magliaro	President Association of Teacher Educators in Virginia	<p>Both Program Approval and Licensure Regulations reinforce a two-tiered system in teacher education: one route through the IHEs and approved programs, and the second route through alternative licensure and professional licensure routes. Test requirements, field experience requirements, depth and breadth of preparation curricula (to name a few) are elements of the routes that are clearly different. Virginia’s goal to have only highly qualified teachers in the classroom is compromised by the open alternate route that reinforces the notion that learning to teach is not a complex process. ATE-VA is strongly in favor of a “level-playing field” for all routes into teacher licensure, especially with accountability measures that easily can be used to compare across IHEs without attention to program quality. Current data indicate that teach attrition is greater for those who complete preparation through an alternative route (Darling-Hammand, NCTAF). Virginia cannot afford to compromise the quality of its personnel who teach the future of the Commonwealth – our children.</p>
9/20/2005	Sandra B. Cohen	Director, Teacher Education, Curry School of Education, UVA	<p>8VAC20-22-90 Alternate Routes to Licensure: We would like to see a recommendation that school divisions and other approved programs must partner with an IHE in order to be approved as a certified provider... We are concerned about the proposal that experience can be substituted in place of course work for alternative licensure by criteria specified by BOE...</p>
12/14/2006	Dr. Brenda G. Gilman	President, VACTE	<p>To maintain a high quality teaching force in Virginia, we strongly believe that all candidates entering the teaching profession should be held to the same standards no matter the route to licensure. Current research (Darling-Hammond, et. al.) data indicate that those who come through alternative routes do not remain in teaching as long those out traditional programs. Standard accountability for teacher candidates will strengthen and retain our teaching force.</p>

Changes in Health and PE Endorsement

Date	Name	Title and Organization	Changes in Health and PE Endorsement
12/7/2006	Thomas E. Bartosh	Licensure Specialist Virginia Beach City Public Schools	<p>On behalf of Virginia Beach City Public Schools Department of Human Resources, the items presented below are provided as public comments to the <i>Regulations Governing the Licensure of School Personnel</i>. We ask that this information be presented to the Virginia Board of Education for its consideration before final action is taken on these regulations.</p> <p>We support the following proposed revisions: 8VAC20-22-130 through 500. Overall, we support the content course requirements, professional studies, and name revisions. However, under the Health and PE endorsement (paragraph 370), we feel that the change in hours could lead to confusion. The change in anatomy, physiology, and kinesiology hours from 12 hours to 9-12 hours and the change in electives from 6 hours to 3-6 hours is inconsistent with the overall format used in the other endorsements. We recommend the change to be 9 hours and 3 hours respectively.</p>

Changes in Special Education Endorsements

Date	Name	Title and Organization	Changes in Special Education Endorsements
12/7/2006	Thomas E. Bartosh	Licensure Specialist Virginia Beach City Public Schools	<p>On behalf of Virginia Beach City Public Schools Department of Human Resources, the items presented below are provided as public comments to the <i>Regulations Governing the Licensure of School Personnel</i>. We ask that this information be presented to the Virginia Board of Education for its consideration before final action is taken on these regulations.</p> <p>We support the following proposed revisions: 8VAC250-22-520 and 530. Special Education Adaptive and General. We support these combined endorsements. We feel this will eliminate confusion when considering out-of-state applicants with general special education endorsements and reduce the requirements to re-evaluate current teachers who change positions.</p>
12/15/2006	Dr. Leigh Butler	Old Dominion University	<p>8 VAC 20-542-470 – Special Education – special education general curriculum K-12</p> <p>Changing the special education program into a “general education curriculum” and an “adapted curriculum” is the Virginia Department of Educations effort to push inclusion. Teachers will choose to stay away from the profession without the option to work with students that they believe they will be the most successful. When teachers had the choice to specialize they had an idea what type of students they would be working with and to learn unique strategies for the population. With</p>

Date	Name	Title and Organization	Changes in Special Education Endorsements
12/15/2006	Vince Indelicato		<p>this new category, teachers can end up working with all types of students which they may not be prepared.</p> <p>With regards to 8VAC250-22-520 and 8VAC250-22-530, I am in favor of changing the special education endorsements from the current laundry list of disabilities and impairments to the much broader categories of adapted curriculum and general curriculum. This change not only makes sense from a licensure standpoint, since for most special education endorsements the only differences between them are the characteristics and methods classes, but from a practical one as well, since, except in the largest divisions in the state, many special education classrooms serve a mixture of students in the same classroom. This change would allow a special education teacher with the new endorsement to teach all of the relevant students without having to add multiple special education endorsements to them, as is currently the case.</p>
10/19/2006		State Special Education Advisory Committee (SSEAC)	<p>The SSEAC recommends that the license of teachers of students with disabilities accessing the general curriculum be divided into elementary (K-6) and middle/secondary and that coursework be included in each license to meet the grade level content skill and knowledge requirements.</p> <p>The SSEAC endorses the concept of an add-on endorsement for teachers already licensed as elementary teachers or content teachers provided that the add-on endorsement is either at the elementary or middle/secondary level.</p> <p>The SSEAC recommends that wording on the proposed endorsement for “teachers of children with disabilities in the adapted curriculum” change the word “adapted” to the word “aligned” to match state assessment terminology.</p> <p>The SSEAC recommends that a requirement of competence in “orientation and mobility” be added to the VI teacher endorsement.</p> <p>The SSEAC recommends that all general education teacher licensure programs require competency in characteristics, legal issues, and instructional strategies for children with disabilities.</p>
11/27/2006	Ann Maydosz	Adjunct Faculty Program Coordinator The Commonwealth Special Education Endorsement Programs: Alternative Licensure Through Distance Education (CSEEP)	<p>The CSEEP Advisory Board supports the availability of a 15 hour program to add the special education-general curriculum endorsement for a teacher already endorsed in elementary education.</p> <p>Regarding the proposed endorsement in special education- adapted curriculum, the CSEEP Advisory Board felt the work “aligned” should be substituted for</p>

Date	Name	Title and Organization	Changes in Special Education Endorsements
		Old Dominion University	<p>“adapted.”</p> <p>The CSEEO Advisory Board recommends a required number of hours (6) of special education for general educators.</p>
12/5/2006		Department of Education Marymount University	<p><u>Section 8 VAC 20-542-460: Special Education – special education adapted curriculum K-12 and Section 8 VAC 20-542-470: Special Education – special education general curriculum K-12</u> include information outlining the requirements for Assessment and Management of Instruction and Behavior. This portion does not include specific Virginia assessments, which special education teacher candidates need to understand. Therefore, the Assessment and Management of Instruction and Behavior portion should include an understanding and application of Virginia assessments and alternate assessments include the Standards of Learning (SOL) Assessments, the Virginia Grade Level Alternative (VGLA), the Virginia Substitute Evaluation Program (VSEP), and the Virginia Alternate Assessment Program (VAAP).</p>
12/6/2006	Dr. Alice M. Farling	Assistant Superintendent Fairfax County Public Schools	<p>The purpose of this letter is to provide a response to the proposed revisions to Licensure Regulations for School Personnel. Fairfax County Public Schools (FCPS), Office of Special Education, presents the following public comment highlighting the prospective changes to licensure specifications for special education teachers in Virginia.</p> <p>FCPS supports the proposed changes for noncategorical licensure for special education teachers. In an effort to provide students with disabilities greater access to an expanded continuum of educational services, FCPS endorses the change of state licensure for special education teachers from a categorical approach to one encompassing two broader endorsements in special education: special education – adapted curriculum and special education – general education curriculum.</p> <p>The noncategorical licensure focuses on greater instructional support for students that maximize teacher resources for benefit to all students. Currently, FCPS provides categorical special education services as prescribed by the Virginia Department of Education Special Education Program Standards. The current categorical framework suggests that the needs of students in each category of disability differ dramatically, and that teaching strategies and skills are unique to each disability. Yet, individual student needs are broad and complex and are often difficult to address within the parameters of narrowly defined categories.</p> <p>By structuring state licensure for special education</p>

Date	Name	Title and Organization	Changes in Special Education Endorsements
			<p>teachers to encompass two broader endorsements in special education, it will allow educators to expand their thinking to freely evaluate the needs of students in terms of individual strengths, developmental levels, and learning styles. The proposed licensure for special education teachers will provide a broader knowledge base for special education teachers and provide instructional strategies that are effective for many groups of learners. In addition, the proposed licensure will provide greater flexibility for staffing needs within individual school districts, It is the belief of FCPS that these changes will promote staff expertise to benefit all students with disabilities.</p>
12/1/2006	<p>Dr. Pamela Hudon Baker</p> <p>Dr. Michael E. Behrmann</p> <p>Dr. Frederick Brigham</p> <p>Dr. M. Susan Burns</p> <p>Dr. Judith Fontana</p> <p>Amie Fulcher, M. Ed.</p> <p>Dr. Joseph C. Gagnon</p> <p>Dr. Mark B. Goor</p> <p>Dr. Lori Jackman</p> <p>Marci Kinas-Jerome, M. Ed.</p> <p>Dr. Margaret King-Sears</p> <p>Dr. Margo A. Mastropieri</p> <p>Dr. Nikki Miller</p> <p>Dr. Jane A. Razeghi</p> <p>Carmen Rioux-</p>	<p>Assistant Professor of Education</p> <p>Professor of Special Education</p> <p>Associate Professor of Education</p> <p>Associate Professor of Education</p> <p>Assistant Professor Special Education Advisor</p> <p>Assistant Professor of Education</p> <p>Professor of Education</p> <p>Assistant Professor of Education</p> <p>Instructor</p> <p>Professor of Education</p> <p>Professor of Education</p> <p>Professor of Education</p> <p>Associate Professor of</p>	<p>The faculty of the special education teacher education programs commends the Commonwealth of Virginia for the proposed changes to teacher licensure in the state. We are focusing our comments on issues related to children with special needs.</p> <p>The faculty of George Mason University supports the following changes to the proposed licensure requirements.</p> <ul style="list-style-type: none"> • Consistent with the proposed changes, we endorse the proposal to move the Masters Level SLP to Pupil Personnel and the proposal to include in the state licensure endorsement, the Speech/Language Assistant (<i>provided that they are supervised by a masters level SLP</i>) • These faculty of George Mason University recommend that coursework is included in each license to meet the grade level highly qualified content skill and knowledge requirements (at least one content area at middle and secondary). • These faculty of George Mason University endorse the proposal that for the purposes of Provisional Licensure, all state required tests must be passed during the first year of licensure. • These faculty of George Mason University recommend that wording on the proposed endorsement for “teachers of children with disabilities in an adapted curriculum” change the word “adapted” to the word “aligned” to match state assessment terminology. • These faculty of George Mason University support a requirement of competence in “orientation and mobility” be added to the VI teacher endorsement. • These faculty of George Mason University recommend that all general education teacher licensure programs require competency in characteristics, legal issues and instructional strategies for children with disabilities.

Date	Name	Title and Organization	Changes in Special Education Endorsements
	Bailey, Ed.S. Dr. Thomas E. Scruggs Terry Werner, J.D.	Education Instructor Professor of Education Director of Special Education Outreach Programs George Mason University	<ul style="list-style-type: none"> These faculty of George Mason University recommend that the Praxis I be dropped as a requirement for entry into initial licensure programs. We currently do not use these scores to admit students to our academic programs, only the teacher licensure programs. It is a financial and administrative burden to students and to the universities. All other required licensure tests should remain in effect.
Undated	Mary Jo S. Howarth	Special Education Teacher	As a special education teacher, I am in favor of changing the special education endorsement from LD, ED, MR to special education – adapted curriculum and special education – general curriculum. This will allow special education teachers the flexibility to teach a variety of students, especially co-teaching in the general education classroom. This will allow them to impact a larger student population and improve the quality of education for all students.
12/5/2006	Dr. Mike Behrmann	Professor of Special Education at George Mason University	Suggested secondary/middle/elementary levels for special educators Ideas consistent with NCLB Supported the idea of add-on in special education as the appropriate levels
11/1/2005	Ed Polloway	Lynchburg College	<p>Concerns regarding regulations:</p> <ol style="list-style-type: none"> Conditional License: If a determination is made to retain the conditional/provisional license in special education, I recommend that consideration be given to a six hour requirement that incorporates the current emphasis on legal aspects and characteristics but also includes an additional emphasis on instructional methodology...It may, in part, address the issue of individuals who simply take one course as a way to obtain a position and then do not proceed to complete requirements. New endorsements: As you moved toward the new proposed endorsements that are non-categorical, I would suggest the following: <ul style="list-style-type: none"> Provide guidance both to current teachers and to institutions of higher education as to how the current high incidence/mild disability endorsements can be transferred over to a new special education general curriculum endorsement with appropriate training/coursework. <p>I support the new requirements for highly qualified (I support what I believe is your decision to allow those teachers who have one</p>
12/15/2006	Larry E. Shobe	Executive Director of	bVAC20-22-50 Types of Licenses – Incorporating the

Date	Name	Title and Organization	Changes in Special Education Endorsements
	John Linaburg Katherine Funkhouser	Human Resources Assistant Director of Human Resources Licensure Analyst	special education license under the provisional license. 8VAC20-22-520 Special education – adapted curriculum K-12 and 8VAC20-22-530 Special education – general curriculum K-12 8VAC20-22-540 Special education- speech language pathology assistant prek-12 We support these changes.

Changes in Licensure Renewal

Date	Name	Title and Organization	Changes in Licensure Renewal
Undated	James R. Amaral	President, District 9 Virginia Education	Currently, Licensure Code 8VAC20-22- 110 requires the accrual of 180 professional-development points

		Association	<p>within five year periods. Ever since I started teaching, I consistently exceeded the required number of points, usually doubling, tripling, and even quadrupling the needed 180. I am far from being alone in this accomplishment. As does VEA, I urge the Board of Education to begin allowing excess license renewal points from [SIC] ne five year cycle to be rolled over into the next five year renewal cycle. I make this request not to enable teachers like myself who continually exceed the required renewal points each five years to stop engaging in professional development activities, but to allow them time to increase and enhance their pedagogic knowledge in ways that are no longer accepted for licensure renewal due to a change in the definition of “Highly Qualified” under No Child Left Behind regulations.</p> <p>Two summers ago, I spent six weeks in Japan learning first-hand how Japanese educators teach. Similarly, I regularly try to observe exemplary colleagues in the U.S. to study their teaching methods. From these experiences I have learned much that has enhanced my teaching ability yet I and the rest of Virginia’s teachers may no longer count educational travel nor peer observation for recertification credit. The time and money that we must use in achieving 180 points using other recertification options every five years inhibits our ability to utilize these two other valid methods of professional development. By allowing teachers to apply excess renewal points from one cycle to the next, teachers will still be able to devote their time and limited financial resources to improve their teaching abilities via peer observation and educational travel.</p>
12/15/2006	Larry E. Shobe John Linaburg Katherine Funkhouser	Executive Director of Human Resources Assistant Director of Human Resources Licensure Analyst	<p>8VAC20-22-110 Requirements for renewing a license Changing the 10 renewal options to 8 would pose no problem as most individuals do not use peer observation or educational travel.</p>
11/30/2006	Beverly Baker	Compliance Officer Prince William County Public Schools	<p>8VAC20-22-110. Requirements for renewing a license. (Page 15) We support removing Peer Observation and Education Travel from the list of options to renew a license.</p>
12/4/2006	Barbara Warren Jones	President – Tidewater Association of School Personnel Administrators – Region II	<p>On behalf of the Region II Tidewater Association of School Personnel (TASPA) membership, we present the following comments and concerns highlighting the prospective changes to licensure specifications and the serious impact that they will have on Virginia’s Region II school divisions if implemented.</p>

			We support moving from ten to eight categories for recertification points. This will not pose any problems.
9/19/2006	Shawn Finerty Debra Reader	Licensure Coordinator Fairfax County Public Schools Director, Employment Services Fairfax County Public Schools On behalf of the Region IV Human Resources Directors	We support: Moving from 10 to 8 categories for recertification points. This will not pose any problems.

International Educator’s License

Date	Name	Title and Organization	International Educator’s License
12/11/2006	Dr. Edgar B. Hatrick	Superintendent Loudoun County Public Schools	<p>On behalf of Loudoun County Public Schools, I am writing to support the proposed change to the <u>Regulations Governing the Licensure of School Personnel</u> regarding the International Educator License as found in 8 VAC 20-22-50 No. 8.</p> <p>We have been hosting international exchange teachers for several years. At this time, approximately 90 exchange teachers are bringing diversity, culture and languages into our classrooms. The International Educator License will serve our school district, and others, by defining that there is a specific license for international exchange educators. The license is clear as to who qualifies for this license and the professional requirements the person must meet to receive this license.</p> <p>The license also sets standards for these teachers. Proficiency in written and spoken English is required. The teachers must demonstrate competence in the appropriate academic subject areas and hold the US equivalent of a baccalaureate degree or higher. The teachers must hold teaching credentials in their home country and be a veteran educator. These requirements ensure that these teachers are well-qualified to be part of our educator staff.</p> <p>International exchange teachers are part of a program that is directed by the US Department of State. This proposed license will align with the teaching requirement portion of federal regulations (22CFR 62.24) that govern teacher exchange programs which allows for consistency at the federal and state levels.</p> <p>Loudoun County Public Schools appreciates the opportunity to go on record in support of the proposal to establish an International Educator License for international exchange teachers.</p>
11/28/2006	Mary Donny	Director of Government Relations Visiting International Faculty Program	<p>I am writing to respectfully request that international exchange teachers seeking the International Educator License be added to the proposed revisions to the <u>Regulations Governing the Licensure of School Personnel</u> as found in <u>8VAC20-22-40B</u>. Per earlier discussions and agreements with the Virginia Department of Education, we would appreciate the continuation of the current policy of exempting international exchange teachers from professional teacher assessments. These teachers come on an exchange program regulated by the U.S. Department of State. The program promotes the interchange of American and foreign teachers in school and enhances mutual understanding.</p> <p>Under the Code of Federal Regulations 22§62.64, these educators must meet strict criteria in order to participate as an exchange teacher. They must meet all the qualifications for teaching in primary or</p>

Date	Name	Title and Organization	International Educator's License
			<p>secondary schools in their country of nationality. The educators are required to have teaching experience. In addition, the exchange teachers must meet the teaching standards of the state in which they will be teaching. As an exchange teacher participant, the teachers are in the United States on a limited and temporary basis. Their J exchange visitor visa only permits a stay of 3 years or less as they are here to absorb US teaching practices, culture and customs and then are to return home and share this knowledge with their colleagues and students.</p>
11/28/2006	David B. Young	Chief Executive Officer Visiting International Faculty Program	<p>I am writing on behalf of the Visiting International Faculty Program regarding the proposed change to the <u>Regulations Governing the Licensure of School Personnel</u> as recently announced. We support the creation of the International Educator License as found in 8 VAC 20-22-50 No. 8.</p> <p>As the largest K-12 exchange teacher program in the United States, we are pleased to work with the State of Virginia and its school districts to host teachers from over 50 countries. The International Educator License will serve school districts by making clear what license is appropriate for cultural exchange teachers. The license outlines how a person qualifies for this license and the professional requirements the person must meet to receive this license.</p> <p>The license also ensures the students of these teachers will have a teacher who is proficient in written and spoken English; demonstrate competence in the appropriate academic subject areas; hold the U.S. equivalent of a baccalaureate degree or higher; and hold US or foreign educator credentials and have at least one year successful teaching experience. The requirements are quite similar to those for domestic-born teachers in Virginia.</p> <p>The requirements, as established in this new license, align with the federal regulations (22 CFR 62.24) that govern teacher exchange programs. This helps to ensure that there are clear parameters in place both at the federal and state levels. To that end, by limiting the use of this license to a time period not to exceed three consecutive years, the state helps ensure compliance with the U.S. Department of State's requirement that the teacher fulfill the exchange by returning to their home country and sharing the experiences they had in the US with their students and colleagues.</p>
12/12/2006	Dr. Philip L. Worrell	Superintendent Greensville County Public Schools	<p>I am writing on behalf of the Greensville County Public Schools to support the proposed change to the <u>Regulations Governing the Licensure of School Personnel</u> regarding the International Educator</p>

Date	Name	Title and Organization	International Educator’s License
			<p>License as found in 8 VAC 20-22-50 No. 8.</p> <p>We have been a participant in an exchange program for several years. In fact, this year, we currently have two international exchange teachers from around the world in our schools. The International Educator License will help our school district in understanding that there is a specific path for licensure for our exchange educators. We appreciate that the license sets forth the qualifications needed by an exchange teacher to obtain the license.</p> <p>The license matches the federal standards that are required by the U.S. Department of State regulations (22 CFR 62.24). For instance, the teachers must be proficient in written and spoken English. They must demonstrate competence in the appropriate academic subject areas and hold the US equivalent of a baccalaureate degree or higher. The teachers must be trained educator [sic] in their home country and have teaching experience. These requirements ensure that these teachers are qualified to serve as educators in Greenville County’s classrooms.</p> <p>Greenville County Schools supports the creation of this International Educator License and requests its approval by the State Board of Education.</p>

Mathematics Specialist

Date	Name	Title and Organization	Mathematics Specialist
12/12/2006	Susan Birnie	President Virginia Council of Mathematics Supervision	<p data-bbox="834 682 1432 829">As the current president of the Virginia Council of Supervision of Mathematics, I am writing to express support for the proposed endorsement of the Mathematics Specialist for Elementary and Middle Education.</p> <p data-bbox="834 863 1432 1104">Professional development is essential to assure that students receive mathematics instruction from teachers who have a deep understanding of the content. Many teachers are not prepared for the challenge of educating all students to high levels. The traditional workshops, conferences, and courses do not provide the on-going math content support that teachers need to improve teaching and learning in a substantial way.</p> <p data-bbox="834 1138 1432 1560">Well prepared Mathematics Specialists as coaches provide ongoing, imbedded support to teachers and principals to improve classroom instruction. The coaches work side by side with teachers, observe their work and offer models of effective practice. They provide resources to help teachers meet the challenge of teaching diverse learners. They collaborate with all teachers through co-planning and co-teaching to facilitate the use of successful and research-based instructional strategies. To meet the demands of data driven instruction, Mathematics Specialists work closely with building principals to assist with the examination of a school wide improvement plan based on division and state standards.</p> <p data-bbox="834 1593 1432 1892">Coaching helps educators make informed decisions about instruction that will lead teachers to teach in ways that help students make sense of the mathematics and gain a deep understanding of the subject matter. Through posing questions and challenging students' thinking, the Mathematics Specialist sets the stage for teachers to engage students in experiencing, creating, and solving problems. The collegial relationship between the Mathematics Specialist and the classroom teacher focuses on the concrete task of teaching,</p>

Date	Name	Title and Organization	Mathematics Specialist
			<p>assessment, and reflection of practice.</p> <p>The bar continues to be raised in terms of what students are expected to know and be able to do. The SOLs ask first grade students to master objectives in algebra and probability. The typical classroom teacher is trained as a generalist and until just recently that was enough. Today’s elementary classroom teacher needs to understand the concepts behind the algorithms and students’ mathematical thinking. They need to know how to offer intervention for the struggling student and how to enrich the curriculum for those children who are ready for more challenging work. Teachers need to have a wealth of instructional strategies at their finger tips and access to mathematical expertise on a daily basis.</p> <p>In a recent National Council of Teachers of Mathematics newsletter, Past President Cathy Seeley talks about how to be the best mathematics teacher you can be. She says, “The better you know mathematics, the better you can recognize where your students are headed when they explain their thinking. The better you know mathematics, the better you’ll be at coming up with questions to push your students’ thinking and deepen their understanding. And the better you know mathematics, the better you’ll be at making sound professional decisions about programs and practices. But to be an effective teacher, knowledge of mathematics also has to be grounded in knowledge of how to teach mathematics—some call this mathematical pedagogy. Only when you know how mathematical ideas develop, how students acquire mathematical knowledge, and what elements of instruction help foster this knowledge will you be fully able to apply your mathematical knowledge to support student learning.” The Mathematics Specialists are the key to enable every K-8 teacher to become not only effective, but masterful teachers of mathematics.</p> <p>Virginia is leading the nation in educating and planning for Mathematics Specialists. An increasing number of school systems in the state, including Alexandria, Arlington, Spotsylvania, Stafford, Hopewell, Norfolk, Culpeper, Roanoke, and Hanover are utilizing well prepared Mathematics Specialists with great success to improve students’ learning and understanding of mathematics. . The Virginia mathematics supervisors look forward to the endorsement of the Mathematics Specialists and in continued collaboration with the Virginia Mathematics and Science Coalition and Virginia’s Institutes of Higher Education to expand preparation programs for mathematics specialist in order to increase the numbers of teachers who are well</p>

Date	Name	Title and Organization	Mathematics Specialist
12/15/2006	Julia H. Cothron	President, Virginia Mathematics and Science Coalition	<p>prepared to take on these roles as school divisions continue to add mathematics specialists.</p> <p>The Virginia Mathematics & Science Coalition (VMSC) is an alliance of education, corporate, and public policy leaders working together to improve mathematics and science education in Virginia throughout all grade levels. Our members include those, such as George Mason University, with direct responsibility in the preparation of pre-service teachers; other members, such as the Virginia Science Education Leadership Association, consist of individuals that provide leadership within school divisions and support the professional development of in-service teachers. One of the great strengths of the Coalition is the variety of perspectives and competencies that we can apply toward our mission.</p> <p>The Coalition has reviewed the Proposed Revisions to the Regulations Governing the Licensure of School Personnel (8 VAC 20-22-10 et seq.) posted on the Virginia Department of Education’s Web site. The Coalition greatly appreciates the inclusion of the K-8 Mathematics Specialist Endorsement in the proposed regulations – a project upon which we have spent many hours. We are encouraged to hear that the school divisions that have utilized mathematics specialists have noted positive impacts on both teacher professional growth as well as the resulting positive impact on student achievement.</p>
12/5/2006	Julia H. Cothron	President, Virginia Mathematics and Science Coalition	<p>On behalf of the Virginia Mathematics and Science Coalitions (VCSC), we thank you for your ongoing support of a mathematics specialist endorsement, as contained in the proposed <i>Regulations Governing the Licensure of School Personnel</i> and <i>Regulations Governing the Review and Approval of Education Programs in Virginia</i>.</p> <p>Coalition members firmly believe that this endorsement is critical to the ability of our K-8 mathematics teachers to provide instruction that will advance math achievement in the Commonwealth’s schools. This is especially important as schools and students are under increasing pressure to meet higher achievement benchmarks for mathematics. Properly prepared and experienced mathematics specialists will help improve student achievement in math by enhancing the instructional capabilities and content knowledge of elementary and middle school teachers.</p> <p>Thank you for your thoughtful consideration of the proposed regulations and your continuing efforts to provide quality public education in Virginia.</p>

Changes in Earth Science Endorsement

Date	Name	Title and Organization	Changes in Earth Science Endorsement
12/15/2006	Dr. Julia H. Cothron	Director, Virginia Earth Science Collaborative Executive Director, Mathematics and Science Center	<p>During the last two years, I have led the development and implementation of a Math-Science Partnership Grant entitled “Virginia Earth Science Collaborative: Developing Highly Qualified Teachers.” The Collaborative consists of nine institutes of higher education and non-profits and more than sixty participating school divisions. The Collaborative has developed a series of courses to enable teachers to obtain the Add-On Earth Science Endorsement (18 hrs) or to begin work on the full endorsement (32 hrs). During the first eighteen month, the Collaborative trained 379 teachers in 25 sections across the Commonwealth. Information on the Collaborative is available at http://VirginiaEarthScience.info .</p> <p>In reading the proposed changes in 8VAC20-22-480.Science – Earth science, it appears that an oversight occurred when the environmental science major was added:</p> <p style="margin-left: 40px;">2. <i>Completed a major in geology or environmental science with at least one course in each of the following:</i></p>

			<p><i>oceanography, meteorology and astronomy, or . . .</i></p> <p>As written, an environmental science major could obtain an endorsement without a course in geology.</p> <p>Given that the current Standards of Learning for Earth Science consist of approximately fifty percent geology, it is essential that an individual have a strong background in geology. For example, the sequence of courses developed by the Virginia Earth Science Collaborative consists of 2 geology, 1 oceanography, 1 astronomy and 1 meteorology course. To ensure that an environmental science major has the geology background to teach the Standards, it is recommended that the language be strengthened to include two geology courses. In addition, you may not be aware that James Madison University has recently implemented an Earth Science degree; with the current language this major may not be recognized.</p> <p>Because of the above, the Collaborative encourages you to modify the language, as stated below:</p> <p style="padding-left: 40px;">2. <i>Completed a major in geology, environmental science, or earth science with at least two courses in geology and one course in each of the following: oceanography, meteorology and astronomy , or . . .</i></p> <p>If you have any questions or would like to discuss this matter further, please contact me at (804) 343-6525</p>
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Early Childhood Education

Date	Name	Title and Organization	Early Childhood Education
12/15/2006	Mark Allen	Virginia Board of Education's National Association of State Boards of Education Early Childhood Grant Committee	<p>Thank you for all you do on behalf of young children. It is an honor to work with such dedicated professionals to help create classrooms where our children and grandchildren will feel safe and where teachers can focus on the whole child, and provide for developmental, emotional, social, and academic success. We all know that the quality of teacher training provided today will impact children for years to come.</p> <p>There is overwhelming research evidence that indicates that high quality teaching has the greatest impact on success for children. For the 30 percent of children at risk prior to kindergarten, responsive social and emotional support in the classroom mediates against all other risk factors and provides for increased development for children in every area. These include:</p>

Date	Name	Title and Organization	Early Childhood Education
			<ul style="list-style-type: none"> • <i>Long lasting improvements in academic achievement;</i> • <i>Higher early and lasting literacy rates;</i> • <i>Increased high school graduation rates;</i> • <i>Employment stability;</i> • <i>Higher IQ;</i> • <i>Greater cognitive development;</i> • <i>Better outcomes for children with disabilities and less referral to special education overall;</i> • <i>Less grade retention;</i> • <i>Healthy relationships with adults and peers; and</i> • <i>Increased prosocial skills including emotional and academic self regulation - the ability to focus attention, to follow directions, and to successfully negotiate social contexts.</i> <p>We know that academic skills for children are best gained through genuine, sensitive, caring relationships. Teachers have the power to help children believe in themselves and to turn them on to learning! We need to train teachers to create an atmosphere of trust where children are free to explore, create, investigate, learn, and discover - while staying emotionally connected to those around them. We want to ensure and life!</p> <p>Equipping teachers to create these positive classroom environments for preschool children is an important task. We know that stressful, punitive environments can increase physical and mental health problems, compromise children’s immune systems, increase conduct problems, and incarceration rates. Making changes now to develop strong, capable preschool teachers is an investment that will pay off in long-term economic, social, and educational benefits.</p> <p>We respectfully make the recommendation that the board consider reforms to the existing document to include an “Add-on Endorsement in Early Childhood for Three- and Four-Year-Olds” which will effectively prepare teachers to provide for the unique social and educational needs of young children in the Commonwealth of Virginia.</p>
			<p><u>Recommendation: “Add-On Endorsement in Early Childhood for Three- and Four-Year-Olds”</u></p> <p>A. The program in early childhood education for three- and four-year-olds shall ensure that the candidate has demonstrated the following competencies:</p> <ol style="list-style-type: none"> 1. Understanding child growth and development, with a specific focus on three- and four-year-olds, including:

Date	Name	Title and Organization	Early Childhood Education
			<ul style="list-style-type: none"> a. Knowledge of characteristics and developmental needs of three- and four-year-olds, including the ability to recognize indicators of atypical development, in the domains of social, emotional, cognitive, physical, and gross and fine motor development; b. Understanding of the multiple interacting influences on child development (biological and environmental), interconnectedness developmental domains, the wide range of ages at which development skills are manifested, and the individual differences in behavioral styles; and c. Knowledge of child development within the context of family, culture, and society. <p>2. Understanding principles of developmental practice, with a focus on three- and four-year-olds, including practices that are:</p> <ul style="list-style-type: none"> a. Appropriate to the child's age and stage of development; b. Appropriate for children with a wide range of individual differences in abilities, interests, and behavioral styles; and c. Appropriate for the child's cultural background and experience. <p>3. Understanding health, safety, and nutritional practices that impact early learning including:</p> <ul style="list-style-type: none"> a. Practices and procedures that support health status conducive to optimal development (e.g., health assessment, prevention of the spread of communicable disease, oral hygiene, reduction of environmental hazards, injury prevention, emergency preparedness); b. Indicators of possible child abuse or neglect and the appropriate response if such indicators are observed; c. Nutritional and dietary practices

Date	Name	Title and Organization	Early Childhood Education
			<p>that support healthy growth and development while remaining sensitive to family preferences;</p> <ul style="list-style-type: none"> d. Skills for communicating with families about health and dietary concerns; e. Community resources that support healthy living; and f. Practices that allow children to become independent and knowledgeable about healthy living; <p>4. Understanding and application of formal and informal assessment procedures for documenting development and knowledge of how to use assessment to plan curriculum, including:</p> <ul style="list-style-type: none"> a. Age and stage-appropriate methods for assessing and documenting development; b. Identifying and documenting children’s interests, strengths and challenges; and c. Communicating with families to acquire and to share information relevant to assessment. <p>5. Understanding effective strategies for facilitating positive reciprocal relationships with children for teachers, families and communities, including mutual respect, communication strategies, collaborative linkages among families, and community resources, and nurturing the capacity of family members to serve as advocates on behalf of children.</p> <p>6. Understanding strategies for planning, implementing, assessing, and modifying physical and psychological aspects of the learning environment to support physical, cognitive, and social, as well as emotional well-being in children with a broad range of developmental levels, special needs, individual interests, and cultural backgrounds, including the ability to:</p> <ul style="list-style-type: none"> a. Utilize learning strategies that stimulate curiosity, and encourage participation in exploration and play; b. Provide curriculum experiences

Date	Name	Title and Organization	Early Childhood Education
			<p>that facilitate learning goals in content areas and provide opportunities to acquire concepts and skills that are precursors to academic content taught in elementary school;</p> <ul style="list-style-type: none"> c. Adapt tasks to the child's zone of proximal development; d. Nurture children's development through experiences, relationships and active engagement in play; e. Select materials/equipment, arrange physical space, and plan schedules/routines to stimulate and facilitate development; and f. Collaborate with families, colleagues, and members of the broader community to construct learning environments that promote a spirit of unity, respect, and service in the interest of the common good. <p>7. Understanding strategies that create positive and nurturing relationships with each child based on respect, trust, calm approaches, respect for diversity and acceptance of individual differences in ability levels, temperament, and other characteristics, including the ability to:</p> <ul style="list-style-type: none"> a. Emphasize the importance of supportive verbal and nonverbal communication; b. Establish classroom management practices that are respectful, meet children's emotional needs, clearly communicate expectations for appropriate behavior, promote prosocial behaviors, prevent or minimize behavioral problems through careful planning of the learning environment, teach conflict resolution strategies, and mitigate or redirect challenging behaviors; and c. Build positive, collaborative relationships with children's families with regard to behavioral guidance. <p>B. Endorsement requirements. The candidate must have:</p> <ul style="list-style-type: none"> 1. A Virginia teaching license with an

Date	Name	Title and Organization	Early Childhood Education
			<p>endorsement in elementary education (i.e. prek-3 or prek-6);</p> <ol style="list-style-type: none"> 2. Completed 9 hours of graduate-level course work in early childhood education; and 3. Completed a supervised practicum of at least 45 instructional hours in a preschool setting (three- and four-year-olds) in a public school, an accredited non-public school or another program approved by the Virginia Board of Education. One year of successful, full-time teaching experience in a public or accredited nonpublic school may be accepted in lieu of the practicum.
			<p><u>PROPOSED</u></p> <p><u>8 VAC 20-542-80. Professional studies requirements for early/primary education, elementary education, and middle education.</u></p> <p><u>Professional studies requirements for early/primary education, elementary education, and middle education:</u></p> <ol style="list-style-type: none"> 1. <u>Human growth and development (birth through adolescence). Skills Professional studies in this area shall contribute to an understanding of the physical, social, emotional, and intellectual development of children and the ability to use this understanding in guiding learning experiences and relating meaningfully to children.</u> The interaction of children with individual differences -- economic, social, racial, ethnic, religious, physical, and mental -- should be incorporated to include skills contributing to an understanding of developmental disabilities and developmental issues related to but not limited to attention deficit disorders, gifted education including the use of multiple criteria to identify gifted students, substance abuse, child abuse, and family disruptions. 2. Curriculum and instructional procedures.

Date	Name	Title and Organization	Early Childhood Education
			<p>a. <u>Early/primary education prek-3 or elementary education prek-6 curriculum and instructional procedures. Skills Professional studies in this area shall contribute to an understanding of the principles of learning; the application of skills in discipline-specific methodology; communication processes; selection and use of materials, including media and computers; selection, development and use of appropriate curricula, methodologies, and materials that support and enhance student learning and reflect the research on unique, age-appropriate, and culturally relevant curriculum and pedagogy and evaluation of pupil performance. The teaching methods, including for second language learners, gifted and talented students and those students with disabling conditions, shall be appropriate for the level of endorsement (prek-3 or prek-6) and be tailored to promote student academic progress and effective preparation for the Standards of Learning assessments. Study in methods of improving communication between schools and families, ways of increasing family involvement in student learning at home and in school and the Standards of Learning and Foundation Blocks for Early Learning, and demonstrated proficiency in the use of educational technology for instruction shall be included. Persons seeking initial licensure as teachers and persons seeking licensure renewal as teachers for the first time shall complete study in child abuse recognition and intervention in accordance with curriculum guidelines developed by the Board of Education in consultation with the Department of Social Services that are relevant to the specific teacher licensure routes. Pre-student teaching experiences (field experiences) should be evident within these skills.</u></p> <p><u>b. Early childhood educators will understand the role of families in child development and in relation to teaching educational skills. They will demonstrate knowledge and skills in communicating with families regarding the social and instructional needs of children.</u></p> <p><u>c. Early childhood educators will understand the role of the informal and play-mediated settings for promoting students' skills and</u></p>

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			<p><u>development. They will show knowledge and skill in interacting in such situations to promote specific learning outcomes as reflected in Virginia’s Foundation Blocks for Early Learning.</u></p> <p><u>d. Middle education 6-8 curriculum and instructional procedures. Skills in this area shall contribute to an understanding of the principles of learning; the application of skills in discipline-specific methodology; communication processes; selection and use of materials, including media and computers; and evaluation of pupil performance. The teaching methods, including for second language learners, gifted and talented students and students with disabling conditions, shall be appropriate for the middle education endorsement and be tailored to promote student academic progress and effective preparation for the Standards of Learning assessments. Study in methods of improving communication between schools and families, ways of increasing family involvement in student learning at home and in school, and the Standards of Learning shall be included. Demonstrated proficiency in the use of educational technology for instruction also shall be included. Persons seeking initial licensure as teachers and persons seeking licensure renewal as teachers for the first time shall complete study in child abuse recognition and intervention in accordance with curriculum guidelines developed by the Board of Education in consultation with the Department of Social Services that are relevant to the specific teacher licensure routes. Pre-student teaching experiences (field experiences) should be evident within these skills.</u></p> <p><u>e. Instructional Design Based on Assessment Data. Skills Professional studies in this area shall contribute to an understanding of the relationship among assessment, instruction and monitoring student progress to include student performance measures in grading practices, the ability to construct and interpret valid assessments using a variety of formats in order to measure student attainment of essential skills in a standards-based environment, and the ability to analyze assessment data to make decisions about how to improve instruction and student</u></p>

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			<p>performance.</p> <p>f. Classroom Management. <u>Skills Professional studies in this area shall contribute to an understanding and application of classroom community building, management techniques and individual interventions, including techniques that promote emotional well-being and teach and maintain behavioral conduct and skills consistent with norms, standards, and rules of the educational environment. This area shall address diverse approaches based upon behavioral, cognitive, affective, social and ecological theory and practice. Approaches should support professionally appropriate practices that promote positive redirection of behavior, development of social skills, and of self discipline. The link between classroom management and students' ages will be understood and demonstrated in techniques used in the classroom.</u></p> <p>g. Reading.</p> <p>(1) <u>Early/primary prek-3 and elementary education prek-6 -- language acquisition and reading. Skills listed for these endorsement areas represent the minimum competencies that a beginning teacher shall be able to demonstrate. These skills are not intended to limit the scope of a beginning teacher's program. Additional knowledge and skills that add to a beginning teacher's competencies to deliver instruction and improve student achievement should be included as part of a quality learning experience.</u></p> <p><u>Skills Professional studies in this area shall be designed to impart a thorough understanding of the complex nature of language acquisition and reading, to include: phonemic awareness, concept of print, phonics, fluency, vocabulary development, and comprehension strategies. Additional skills shall include proficiency in writing strategies, as well as the ability to foster appreciation of a variety of literature and independent reading.</u></p> <p><u>Knowledge of typical language development, components and sequence</u></p>

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			<p><u>of literacy development, and the connection between language development and literacy is evident in coursework. Knowledge and skills in specific methods by which adults elicit and foster the components of language development are included.</u></p> <p><u>(2) Middle education -- language acquisition and reading in the content areas. Skills in this area shall be designed to impart an understanding of comprehension skills in all content areas, including a repertoire of questioning strategies, summarizing and retelling skills, and strategies in literal, interpretive, critical, and evaluative comprehension, as well as the ability to foster appreciation of a variety of literature and independent reading.</u></p> <p><u>3. Supervised classroom experience.</u></p> <p><u>The student teaching experience should provide for the prospective teacher to be in classrooms full time for a minimum of 500 clock hours (including pre- and post clinical experiences) with at least 300 clock hours spent supervised in direct teaching activities (providing direct instruction) at the level of endorsement. One year of successful full-time teaching experience in the endorsement area in any public school or accredited nonpublic school may be accepted in lieu of the supervised teaching experience. A fully licensed, experienced teacher shall be available in the school building to assist a beginning teacher employed through the alternate route.</u></p>
12/5/2006	Dr. Peggy S. Meszaros	Professor of Human Development Virginia Tech	<p><i>I am Peggy Meszaros, the William E. Lavery Professor of Human Development at Virginia Tech. I chair the undergraduate curriculum committee in the Department of Human Development, and I am speaking on behalf of Fred Piercy, Department Head. The Department of Human Development offers undergraduate and graduate degrees with specialization in Child and Adolescent Development and as well as [sic] outreach activities that serve citizens of the Commonwealth as part of the University's Land Grant mission. Faculty conduct research on a variety of topics ranging from child development, to family therapy and gerontology.</i></p> <p><i>As professional interest in the development of children and their families, we support regulatory changes that enhance the education and well-being</i></p>

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			<p><i>of children and adults alike. On behalf of Virginia’s youngest learners, we are encouraged by recent activity such [sic] the extension of the Virginia Foundation Blocks for Learning to include social and emotional development. Together with initiatives such as Smart Beginnings and the Start Strong council, this is truly an exciting time in the history of the Commonwealth.</i></p> <p><i>To further enhance Virginia’s commitment to the education of young children, and to prepare a workforce aptly trained to meet the needs of young learners from birth to age five, we suggest that the Board develop regulations for licensure specifically designed for teachers who specialize in educating learners in the birth to five age range. Such a licensure would give much needed recognition to the complexity of skills required to facilitate optimal development in learners of this age. It could capitalize on new research that provides guidance for designing learning environments that emphasize the important of human interactions, play-based learning/assessment techniques, and collaboration with families.</i></p> <p><i>If the Department of Human Development and its faculty can be of assistance in developing guidelines for birth-to-five licensure, we will be honored to serve.</i></p>
12/5/2006	Dr. Cosby Steele Rogers	Retired Professional Department of Human Development Virginia Tech	<p>Hello. My name is Cosby Rogers. I am a retired professor of early childhood education in the Department of Human Development at Virginia Tech. Currently, I teach courses as an adjunct faculty member, and I am an early childhood consultant. I am also a member of the Virginia Association for Early Childhood Education, an organization that advocates high quality early education and teacher preparation.</p> <p>Recognizing the contribution of high-quality early learning experiences to preschool children, it is heartening to see steps being taken in Virginia to create structures and policies to implement high quality early childhood programs. Inherent in the process of change is the challenge of finding appropriate strategies for implementing a vision. The implementation of strong early childhood education programs requires personnel trained specifically to meet the complex needs of young learners. Hence, my comments are related to Proposed <i>Regulations Governing the Licensure of School Personnel</i> (8 VAC20-22-10 et seq.)</p> <p>1. <u>8 VAC20-22-10 et seq. Support of Changes Proposed by Early Childhood Professionals.</u> I fully support suggestions proposed by the</p>

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			<p>Early Childhood Education subcommittee of the Board of Education and by additional editorial suggestions made by Early Childhood faculty at James Madison University (Copy Attached).</p> <p>The essence of the suggested changes is that they strengthen the pre-K focus in the licensure language and acknowledge the need for teachers to be prepared to implement standards specified in the <u>Virginia Foundation Blocks for Early Learning</u>. Additionally, the suggested language reflects the basic tenets of best practices endorsed by the learned societies in the field of early childhood education.</p> <p>2. <u>Birth-to-Five Licensure for Preschool Teachers.</u> I am suggesting that licensure for teachers who work with children from birth to age five be developed and implemented separately from the requirements for the current PreK-3 and PreK-6 licensure requirements. Moreover, based on results of research by Robert Pianta at the University of Virginia, I am recommending that such licensure include professional development that includes activities such as mentoring, coaching, and apprenticeship in addition to formal coursework.</p> <p><i>Rationale:</i></p> <ul style="list-style-type: none"> • Education of children from birth to five requires specialized skills that are especially adapted to meet the social/emotional and physical needs of young learners while simultaneously stimulating cognitive growth. Learning occurs in the context of interactions with teachers who thoughtfully plan integrated activities that meet the needs of learners with diverse backgrounds, ability levels, and learning styles. • While many skills used by elementary school teachers are applicable in early childhood education, early childhood practitioners must be particularly prepared to use integrated, holistic, play-based learning activities that challenge, stimulate, and facilitate development while guiding the development of prosocial behavior, creative expression, and positive dispositions toward

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			<p>learning. They need to be prepared to work with family members even more closely than do elementary school teachers.</p> <ul style="list-style-type: none"> The National Association of State Boards of Education (NASBE) recently published the report from a study group on creating high-quality early learning environments. The document titled <i>Fulfilling the Promise of Preschool</i> (NASBE, 2006) stated: <p style="margin-left: 40px;"><i>...significant progress in the overall quality of preschool programs will not occur until there are improvements in a range of issues related to teachers, including providing better pay, lowering turnover rates, improving preparation, and providing effective professional development</i> (NASBE, 2006, p.4).</p> <p>While many teachers with PreK-3 and PreK-6 licenses are well prepared to meet the complex challenges of working with preschoolers, there is a vast amount of new knowledge about early childhood development and appropriate learning environments, including teacher-child interactions, that cannot adequately be taught in a traditional four-year undergraduate teacher preparation program. Hence, it seems reasonable to suggest that early childhood be given priority in preparing teachers who will work with children in the age range from birth to five.</p> <ul style="list-style-type: none"> Teacher education programs in institutions of higher education may be accredited by the national Council for Accreditation of Teacher Education¹ by meeting the requirements for PreK-3 or for PreK-6.

¹ NCATE's constitution was last updated October 2005 and states its purpose as follows: To accredit education units in US organizations that prepare professional educators to staff school programs for children and youth **from birth** through grade 12(p.3). (NCATE, 2005, downloaded December 4, 2006 from http://www.ncate.org/documents/boards/ncate_constitution.pdf)

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			<p>For programs seeking Prek-3 accreditation, NCATE follows guidelines developed by the National Association for the Education of Young Children, a learned society that is recognized for promoting high quality education for children from birth to age eight.</p> <p>For programs seeking PreK-6 accreditation, NCATE follows guidelines developed by the Association for Childhood Education International. The ACEI guidelines make more frequent mention of the needs of elementary school students and less mention of the requirements of developmental practice as described by NAEYC.</p> <p>Teacher education programs may be accredited in both PreK-3 and PreK-6. However, such programs often require an additional fifth year or Master’s degree. Such is the case for the PreK-6 accredited programs at James Madison University and Virginia Tech. James Madison continues to offer the PreK-3 certification program, but only at the undergraduate level.</p> <p>In the interest, of providing an adequate supply of teachers prepared to teach at the preschool level, it seems prudent to focus professional studies on the preschool years (birth to five) in order to prepare teachers in a four-year time span, perhaps involving articulation between two and four-year institutions.</p> <ul style="list-style-type: none"> • The American Association of Colleges for Teacher Education (AACTE) (2004) listed several challenges to preparing high-quality early childhood teachers. The document titled <i>The Early Childhood Challenge: Preparing High-Quality Teachers For A Changing Society</i> (AACTE, 2004) lists the following challenge and proposed solution: <ul style="list-style-type: none"> • (sic) <ul style="list-style-type: none"> • Challenge: <i>Lack of a stand-alone professional certification for ECE teachers in many higher education institutions. ECE certification is often</i>

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			<p><i>embedded in elementary teacher certification.</i></p> <p>Solution: <i>Establish professional preparation and certification of ECE teachers that is distinct from elementary teacher certification.</i></p> <ul style="list-style-type: none"> • The Foundation for Child Development (FCD) recently published a document titled <i>Ready to teach? Providing children with the teachers they deserve</i> (FCD 2006). Though the FCD report does not focus on birth to three, it does suggest that intensive clinical training is needed to adequately prepare early childhood educators, and that we need to bridge the gap between PreK and elementary education by recognizing the importance of intensive early childhood education. • Some states (e.g., Georgia, North Carolina) have teacher licensure regulations specifically for the birth to five age range, offering the opportunity to learn from their experience. • A birth-to-five licensure would be appropriate for professionals who teach in Head Start, the Virginia Preschool Initiative, and any other programs operated under the auspices of public schools in Virginia. • With the increased number of University Preschool Programs around the United States, the timing is right to put use what we know about early childhood teacher preparation to create a specific professional license for this field of practice which builds the foundation for all education that is to follow.