

STATE OF MINNESOTA
BOARD OF TEACHING

STATEMENT OF NEED AND REASONABLENESS

Concerning the Proposed Amending of Minnesota Rules, Part 8700.7600 Approval of Minnesota Institutions to Prepare Persons for Teacher Licensure and Minnesota Rules, Part 8700.7700 Approval of Teacher Licensure Programs in Minnesota Institutions Approved to Prepare Teachers

The statutory authority of the Board of Teaching to adopt the proposed rules is set forth in Minnesota Statutes, Sections 125.05, subd. 1 and 125.185, subd. 4.

RULES AS PROPOSED

Minnesota Rules, Part 8700.7600 APPROVAL OF MINNESOTA INSTITUTIONS TO PREPARE PERSONS FOR TEACHER LICENSURE

The amendments to this rule are necessary to provide clarification of Board of Teaching decisions regarding institutional approval.

The amendment to Subp. 7.D. sets forth the standard by which institutions will be disapproved. It is reasonable to expect that the Board of Teaching will disapprove institutions that do not meet the institutional approval standards. Decisions of the Board of Teaching are based upon the written report prepared by institutions, and the written report of findings and recommendations of evaluation teams that make on-site visits to each college or university campus. These reports are written in response to the institutional approval standards currently enumerated as listed in Subp. 5. Evaluation teams are charged with applying these standards. Team members are not expected to count or measure the extent to which evidence to support each standard is present or absent; rather, they exercise professional judgments. They make decisions about whether standards are met by considering all the data that are available and applying the standards. Indicators of quality teacher education do not lend themselves to narrow counting of amounts related to technical aspects, such as numbers of faculty, courses, or books, but rather, require that professional decisions be made. The institutional approval process ensures that professional decisions will be made regarding whether standards have been met.

Subp. 8 provides clarification regarding approval status if conditions are not met. It is reasonable that the Board of Teaching would disapprove any institution that did not meet the conditions that the Board of Teaching placed upon the institution as a result of the approval process.

Minnesota Rules, Part 8700.7700 APPROVAL OF TEACHER LICENSURE PROGRAMS IN MINNESOTA INSTITUTIONS APPROVED TO PREPARE TEACHERS

The Minnesota Board of Teaching has adopted a quality assurance system which includes institutional approval and program approval as the basis for licensure of education personnel. This system permits colleges and universities to recommend candidates for licensure. Colleges and universities that voluntarily decide to participate in this system are required to complete an institutional approval process and to submit their programs to the state for approval in order to recommend candidates for licensure who complete these approved programs. The state of Minnesota has made a deliberate decision to license education personnel based on a quality assurance system which requires the completion of approved programs offered by approved institutions. This system, in effect, extends to colleges and universities the responsibility for determining whether state standards for licensure have been met and for recommending that licenses be granted to those persons who meet the state standards. Although institutions have been granted the responsibility for determining whether state standards for licensure are met by persons to be recommended for licensure, institutions do not have the authority to set these standards. This authority is vested, by statute, in the State Board of Teaching.

It is necessary to amend this rule in order to distinguish programs approved under Subp. 6 from those that may be considered experimental in nature and approved under proposed Subp. 8.a.

Candidates for licensure must complete approved programs in order to be recommended for licenses to teach (Minn. Rules Part 8700.0200). It is reasonable to expect that programs approved under Subp. 6 will closely approximate the state adopted licensure requirements. Candidates for licensure must be assured that the published Board of Teaching standard for each licensure rule, as determined through Minn. Stat. Chapter 14, is the standard to be met for licensure to be granted. The concept of the individual's right to know undergirds the licensing system for issuance of licenses to education personnel. Persons are entitled to be licensed based on completion of approved programs that reflect state standards which have been determined, through the required rulemaking process, to be reasonable, rather than arbitrary or capricious. Through the rulemaking process, the quality of teacher licensure program standards is assured, and the need for and reasonableness of these standards is determined.

It is necessary to amend Subp. 6.D. to set forth the standards by which teacher licensure programs will be disapproved. It is reasonable to expect that the standards adopted through the rulemaking process will be the standards that are applied for approval. Preparation programs offered by approved colleges and universities must closely match the standards for licensure. Only then do candidates for licensure have the assurance that the requirements are those which have been publicly determined to be both needed and reasonable. Through the rulemaking process, the collective wisdom of teacher educators, classroom teachers, and the lay public is involved in developing public policy for teacher education.

Program approval standards and licensure requirements are not synonymous concepts. How licensure requirements are met is only one part of program approval standards. Since the granting of licenses permits personnel to practice statewide, the licenses granted must be based on standards adopted by the state and applied statewide. Standards are determined to be needed and reasonable through the rulemaking process. These standards as adopted are the requirements to be met for licensure. They are not the minimum standards from which institutions begin to design programs for approval, since the outcome of the rulemaking process determines the need for and reasonableness of the standards. The Board of Teaching has clear statutory authority to set licensure requirements (Minn. Stat. 125.05, subd. 1 and 125.185, subd. 4) and cannot delegate this authority to other agencies or institutions. The Board of Teaching takes this responsibility seriously and does not propose standards of licensure in an arbitrary or capricious manner. Institutions cannot arbitrarily impose a different standard that has not been determined to be needed and reasonable through the rulemaking process by establishing requirements for entrance into or completion of a teacher licensure program such as additional areas of licensure, additional teaching experience, significant additional credit hours, additional degrees, or other similar additional requirements not specified in licensure rules. In so doing, institutions, not the Board of Teaching, would have, in effect, determined the standards and would have also circumvented Minn. Stat. Chapter 14 without addressing need, reasonableness, or fiscal impact of the standards as required by the rulemaking process.

Subp. 7. provides clarification regarding approval status if conditions are not met. It is reasonable that the Board of Teaching would disapprove teacher licensure programs that did not meet the conditions that the Board of Teaching placed upon the program as a result of the approval process.

Subp. 8.a. is necessary to provide a basis for approval of teacher licensure programs which encourage teacher preparation institutions to explore alternatives that vary from Board of Teaching rules. Minn. Stat. 14.05, subd. 4 requires that agencies adopt rules setting forth procedures and standards by which variances to rules shall be granted and denied.

Current national and state reports regarding teacher preparation all suggest that a variety of models for the preparation of teachers be explored. The Board takes very seriously its responsibilities for providing leadership in teacher education. Teacher education programs must be designed to prepare teachers who demonstrate knowledge of effective teaching behaviors that enhance student learning. At its annual fall planning seminar in September, 1986, the Board of Teaching studied future directions in teacher preparation. Presentations were made to the Board by persons who have served on national and state task forces that studied and developed reports on teacher preparation. The Board then addressed issues involved in the consideration of future teacher education programs and suggested standards to be applied for approval. The Board also endorsed the concept of several different models for teacher preparation in Minnesota. As a result, this proposed amendment provides the opportunity for institutions to request approval of experimental programs to explore alternatives that vary from existing rules.

Subp. 8.b. is necessary to set forth the procedures and standards by which variances to rules shall be granted and denied. It is reasonable to expect that proposals will include the following criteria:

A. A statement of goals and objectives. This criterion is needed and reasonable because it provides the framework upon which the program is designed.

B. A description of the proposed program. This criterion is needed and reasonable because it provides evidence that standards for the approval of the proposed experimental programs are met.

(1) It is necessary and reasonable to expect that the proposed program will serve as a model for possible replication. It is critical that any positive results gained through implementation of experimental programs be made available to the profession to enhance the knowledge base regarding teacher preparation.

(2) It is necessary and reasonable to expect that the proposed program will reflect current research in teacher education. During the past 25 years, major research programs have contributed to knowledge of learning and teaching. In education, as in other professions, the knowledge base is not entirely grounded in empirical evidence; rather, it reflects the collective judgments of respected members, scholars in underlying and related disciplines, persons served by the profession, and scholars building a base for practice. (Shulman, L. S. and Sikes, G. 1986. Teaching As a Profession. Paper presented for Carnegie Task Force.) This current and evolving research on learning and teaching provides the basis for supporting effective teaching practices. This knowledge base must be considered in future teacher education program decisions.

(3) It is necessary and reasonable to expect that the proposed program will have an ongoing research and development component. Currently, there is no research that indicates that a program of any specified structure results in more effective teachers. An ongoing research and development effort will provide information about the effectiveness of a variety of models for delivering teacher education.

(4) It is necessary and reasonable to expect that the proposed program will be designed so that it is significantly different in content and delivery from the currently approved program. The development of experimental programs to explore alternatives that differ from existing programs is encouraged by proposed amendments. (Subp. 8.a. and 8.b.). The redesign of existing curricula and delivery systems will be accommodated under current Subp. 8.

(5) It is necessary and reasonable to expect that the proposed program will provide opportunities for persons enrolled in such programs to know and apply current research on educational effectiveness, since the program will be designed to reflect current research. (Subp. 8.b.B.(2) Persons enrolled in such programs must know effective teaching strategies, why they are important, what results can occur, and when to employ particular strategies. Opportunities must be provided for persons to possess and practice knowledge of effective teaching behaviors that enhance student learning.

(6) It is necessary and reasonable to expect that the proposed program will provide opportunities for persons enrolled in such programs to have regular and systematic field experiences in schools that demonstrate knowledge and use of current research on educational effectiveness. It is in these settings that persons enrolled in teacher licensure programs will be demonstrating the application of current research on educational effectiveness. Since programs will be based on knowledge of effective learning and teaching, [Subp. 8.b.B.(2)] and persons enrolled in such programs will be expected to know and apply such

research, [Subp. 8.b.B.(5)] the field-based settings in which application will occur must demonstrate knowledge and use of research on effective learning and teaching. Schools involved in the Minnesota Educational Effectiveness Program (MEEP) support the implementation of research in their organizational and instructional processes, and may serve as sites for such field experiences; however, this subpart is not intended to be limited to only those schools involved in MEEP.

(7) It is necessary and reasonable to expect that the proposed program will be cooperatively designed, implemented, and evaluated to ensure that elementary and secondary teachers participate as partners with teacher education faculty in the preparation of teachers. Lack of involvement by effective practicing teachers in substantive ways throughout teacher preparation has been a major constraint to effective teacher education programs. (Howey, K. R., Mathews, W. A., and Zimpher, N. L. 1985. Issues and Problems in Professional Development. North Central Regional Educational Laboratory). Teacher education faculty and school personnel must work together to develop, implement, and sustain positive cooperative relationships (Jones, D. W. 1986. "Successful Teacher Education Programs Depend Upon Cooperative Relationship Between Private/Public Schools and Colleges and Universities." Paper commissioned by the Coalition of Teacher Education Programs, University of Indiana.) To best educate effective teachers, teacher education faculty and school personnel must share the responsibility.

(8) It is necessary and reasonable to expect that the proposed program will provide opportunities for teacher education faculty to enhance effective teaching behaviors through staff development opportunities and that faculty will be enabled and supported in the change process. Change is not easy. The reconceptualization and restructuring of teacher education programs requires involvement of the teacher education faculty and is a complex developmental process. Faculty must be supported in designing plans for change, seeking knowledge and skills necessary to implement changes, and participating in implementing and evaluating changes (Whitmore, J. R., 1981. "Lessons Learned from Dean's Grants for the Restructuring of Teacher Education." Journal of Teacher Education, 23 (5), 7-13).

(9) It is necessary and reasonable to expect that persons enrolled in experimental teacher education programs will complete the academic knowledge component of the licensure program. This requirement assures such persons that they will have completed the academic knowledge required in a field for which a licensure rule exists so that a license may be issued valid for that field of preparation.

C. A description of the annual evaluation procedures to be used to demonstrate attainment of the goals and objectives. This criterion is needed and reasonable because it provides a plan by which the institution will evaluate its program and provides assurance to the Board of Teaching that internal evaluation of the experimental program will be conducted.

D. An identification of the Board of Teaching rule from which the institution seeks exemption. This criterion is needed and reasonable because it provides the Board of Teaching with the appropriate reference to the rule for which a variance is requested.

Subp. 8.c. provides for Board of Teaching systematic review of approved experimental programs. It is reasonable to expect that programs once approved are reviewed to ensure continuing compliance with the criteria under which

approval was granted.

FISCAL STATEMENTS

The Board of Teaching estimates that the proposed rules will not require an expenditure of public monies by all local bodies of an amount which exceeds \$100,000 in either of the two years immediately following adoption of the proposed rules.

SMALL BUSINESS

These proposed rules will not directly affect small business within the meaning of Minn. Stat. 14.115.