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Ms. Sibel Hughes
Office of English Language Acquisition and Academic Achievement
Department of Elementary and Secondary Education
75 Pleasant Street
Malden, MA 02148

Dear Ms. Hughes:

On behalf of AFT Massachusetts (AFT MA), thank you for the opportunity to comment on the proposal to extend the Sheltered English Immersion (SEI) Endorsement requirements to vocational technical teachers, as reflected in the proposed revisions to 603 CMR 4.00; 603 CMR 7.00; and 603 CMR 14.00.

We strongly support the idea that all teachers responsible for instructing English language learners (ELLs) should be properly trained and prepared for the job. Therefore, we support extending SEI training and related requirements to vocational technical teachers.

However, we have deep concerns about the proposed implementation of the requirements, and note that the plan and timeline differ in significant ways from the rollout for core academic teachers. Many of these concerns were expressed at a meeting in Malden on April 30 involving AFT MA representative Dan Murphy, staff from the Department of Elementary and Secondary Education (DESE), and representatives from the Massachusetts Teachers Association. Our full comments and concerns are expressed in writing below, along with recommendations for solving identified problems. The comments are organized around the four parts of the proposal.

Part 1: Creation of the Vocational Technical Teacher Cohort

DESE Proposal

- Require career vocational technical teachers who have English learners (ELs) during the 2017-2018 school year, and those administrators who supervise or evaluate them, to obtain the SEI Endorsement no later than July 1, 2020. (DESE estimates that approximately 950 vocational technical teachers would fall into this cohort.)
- “Members of the cohort who fail to earn an SEI endorsement by July 1, 2020, shall not be eligible to advance or renew their license...until such members earn an SEI endorsement; provided however, upon a showing of hardship, the Department may grant a member of the cohort an extension of time beyond July 1, 2020.”

- Per the commissioner’s March 16 memo: “During the 2018-2019 school year, pending approval of the state budget, the Department plans to provide no-cost SEI Endorsement courses to this cohort of career vocational technical educators.”

AFT MA Comments, Concerns, and Questions

While we believe that vocational technical teachers should possess the SEI Endorsement, and while we appreciate DESE’s commitment to providing no-cost courses, we see major implementation problems with this part of the proposal:

- Notification to affected vocational technical teachers (cohort members) is woefully insufficient. We have been told by DESE that the proposed regulations won’t be finalized until the June 26 Board meeting at the earliest. Given that timeline, the most likely scenario is that DESE gives notice to cohort members over the summer, informing them that they must enroll in a course in either Fall 2018 or Spring 2019, and pointing them to their registration options.

In our view, this is insufficient notice for a requirement that is so critical to licensure and employment. Many teachers will be on vacation over the summer and may miss the notice and registration opportunity. Others may have already committed themselves to continuing education or professional advancement plans next school year; for example, many teachers are already taking college courses to advance their preliminary vocational technical license to the professional level.

This rushed rollout stands in stark contrast to the rollout for core academic teachers, who knew about the requirements months or even years in advance of being required to enroll in a course, giving them adequate planning time to incorporate the course into their busy teaching and course-taking schedules.

- The training window—only one year of no-cost courses—is too short to accommodate the varying needs/schedules of teachers. As noted above, many teachers already face demanding teaching, educational, professional, and personal obligations next year. It may be extremely difficult for these teachers to fit the SEI course into their busy schedules, and those who manage to do so may be forced to divert attention away from lesson planning, teaching, and reviewing student work. Again, the contrast to the rollout for core academic teachers is striking: That training window ranged from two to four years, depending on the district, allowing educators considerable flexibility in how they worked the course into their professional and personal lives.
- While the proposed regulations permit the granting of hardship waivers (which we support), a waiver will not guarantee teachers access to a no-cost course in a subsequent year, since the proposal at the current time is to offer no-cost courses in 2018-19 only. In

contrast, a waiver for core academic teachers entitled those teachers to an opportunity to take a free course in a later year.

- Teachers may have difficulty accessing no-cost courses in 2018-19. In addition to the short notice and scheduling concerns raised above, vocational technical schools and teachers are spread across the state. Will teachers have access to courses nearby and at convenient times, or will they have to travel great distances at inconvenient hours and at personal expense?

AFT MA Recommendations

Many of our concerns can be addressed by making the following fixes to the proposal:

- **Expand the training window to two years, so that no-cost courses are offered during both the 2018-19 and 2019-20 school years.** This would give teachers more notice, time, and flexibility to plan for when they take the course, and would more closely parallel the rollout for core academic teachers. It would also allow teachers who qualify for a hardship waiver in 2018-19 to gain access to a no-cost course in 2019-20.
- **Offer courses during the two-year window to non-cohort teachers on a first-come, first-served voluntary basis.** Aside from the costs involved, a concern from DESE may be that offering courses over two years will create more course slots than teachers required to take the course—i.e., more slots than cohort members. However, we see this potential scenario as a wonderful opportunity to allow non-cohort teachers to enroll in the courses on a free or discounted basis, thereby giving more vocational technical teachers the opportunity to access the critical knowledge and skills covered in the SEI course. Offering more courses and opening them up to non-cohort teachers would be an excellent investment that would ultimately benefit students.
- **Offer the SEI courses at the vocational technical school sites, so that teachers don't have to travel long distances to access a course.** Ideally, there should be at least one course offered at every vocational technical school in the state.
- **Offer the SEI courses at convenient and varied times to accommodate diverse schedules.** Ideally, there should be a range of choices for teachers. For example, if a course is offered on Tuesday nights, and a teacher has an ongoing graduate school commitment on Tuesdays, the teacher should be presented with other options (and not just told to apply for a hardship waiver). DESE should consider weekend and summer course options to supplement the weekday and during-the-school-year offerings. DESE should also consider partnering with colleges and universities that are already offering the SEI course as part of their educator preparation programs.

Part 2: Employment Requirement

DESE Proposal

- Starting on July 1, 2020, those career vocational technical teachers who do not currently teach ELs, but are subsequently assigned to provide sheltered English instruction to ELs, will be required to obtain the SEI Endorsement within one year from the date of the assignment.
- Per the proposed regulations: “Starting on July 1, 2020, any career vocational technical teacher who is assigned to provide sheltered English instruction to an English learner shall either hold the SEI Teacher Endorsement, or is required to earn such endorsement within one year from the date of the assignment.”

AFT MA Comments, Concerns, and Questions

While this proposed employment requirement is similar to the requirement for core academic teachers (CATs) that went into effect in July 2016, there are important differences that raise concerns for us:

- CATs had nearly four years to plan for this requirement. The RETELL initiative started in 2012, and the employment requirement for CATs began in 2016. In contrast, the proposal for vocational technical teachers provides only two years to plan.
- Tens of thousands of core academic teachers had the opportunity to take no-cost SEI courses between 2012 and 2016. In contrast, DESE is proposing only one year of no-cost courses for vocational technical teachers, which will allow fewer than 1,000 individuals to access free courses. This means that many vocational-technical teachers still won't have the SEI Endorsement when the employment requirement goes into effect.
- In addition to accessing DESE-provided courses, many CATs were able to become SEI-endorsed because the SEI course was “baked into” educator preparation programs for the initial license. In contrast, there is no DESE proposal at this time to incorporate the SEI course into the standard preparation pathway for vocational technical teachers, raising concerns about how such teachers will access the course before 2020.

AFT MA Recommendations

- **Postpone the employment requirement to July 2021 at the earliest and perhaps to July 2022**, giving vocational technical teachers at least the same amount of time as CATs to plan for the requirement.

- Consistent with our recommendations under Part 1, **expand the training window and availability of no-cost courses to at least two years**, so that more vocational technical teachers can access the course before the onset of the employment requirement, including teachers who aren't required to complete the course for licensure purposes (non-cohort teachers).
- **Incorporate the SEI course into the standard preparation pathway for vocational technical teachers**, so that teachers coming through the pipeline will have automatic access to the course. For example, current regulations require vocational technical teachers advancing from a preliminary to a professional license to complete 18 academic college credits in English, mathematics and science, plus 21 professional education credits from seven courses designated by DESE, for a total of 39 credits. Ideally, the SEI Endorsement course should be “baked into” the seven courses (21-credit requirement), in the same way that the SEI course is baked into educator preparation programs for the initial academic license. To be clear, we are **not** suggesting that DESE add an 8th course for a total of 24 credits. Instead, we are suggesting that DESE undertake a holistic restructuring of the pathway, so that the SEI course becomes a part of the standard 21-credit package.

Part 3: SEI Endorsement as Condition of Earning the Professional License

DESE Proposal

- Starting July 1, 2020, educators applying for a professional vocational technical teacher license must have the SEI Endorsement.
- College degree credits earned through the completion of a Sheltered English Immersion course may be counted towards the 18 academic college credits in English, mathematics and science college required for the professional license under 603 CMR 4.07(4)(g)1 and 603 CMR 4.07(4)(g)2.

AFT MA Comments, Concerns, and Questions

- This is a very tight timeline, considering that the SEI course is not baked into the pathway to the professional license, and there are no current plans to do that. How will teachers working towards the professional license access the course?
- We do not understand the logic of allowing the SEI course to count towards the 18 credits in English, math, and science, but not towards the “21 college credits in professional education courses” required for the professional license. The SEI Endorsement course is a 3-credit graduate-level course in education that is presumably aligned to the Professional Standards for Vocational Technical Teachers. Why not allow the SEI course to substitute for three of the 21 professional education credits?

AFT MA Recommendations

- **Postpone the requirement to possess the SEI Endorsement as a condition of earning the professional license to July 2021 at the earliest and perhaps to July 2022.** This will allow vocational technical teachers more time to plan for this requirement and access the SEI course.
- Consistent with recommendations under Parts 1 and 2, **offer no-cost courses over at least two years** to help solve the access problem.
- Consistent with our recommendations under Part 2, **incorporate the SEI course into the standard 21-credit pathway to the professional license**, thereby ensuring that teachers coming through the pipeline will have access to the course.
- **Allow the SEI course to count towards the 21 credits in professional education courses**, not just the 18 credits in math, English, and science content. Consistent with our recommendations under Part 2, DESE should consider this change in the context of a holistic restructuring of the 21-credit pathway.

Part 4: New Professional License Renewal Requirements

DESE Proposal

- For the renewal of a Professional Vocational Technical Teacher license, professional development points (150 points) must be earned. Per the proposed revisions: “Starting July 1, 2020, of the 150 points, 15 must be related to SEI, English as a Second Language, or bilingual education, and 15 must be related to training in strategies for effective schooling for students with disabilities and instruction of students with diverse learning styles.”

AFT MA Comments, Concerns, and Questions

- This is a very tight timeline, allowing little time (two years) for vocational technical schools and teachers to plan for this requirement. In contrast, academic teachers had four years to plan: RETELL began in 2012, and the license renewal requirements didn't begin until July 2016.
- Do vocational technical schools already offer professional development covering SPED and SEI/ESL, or are they making plans to do so? If not, how will vocational technical teachers earn the necessary PDPs?

AFT Recommendations

- **Postpone the licensure renewal PDP requirements to July 2021 at the earliest and perhaps to July 2022**, giving vocational technical teachers at least the same amount of time as academic teachers to plan for the requirement.
- **DESE should work with vocational technical schools to create and offer the relevant professional development activities.** This could include DESE-designed PD, either traditional or online—for example, the creation of 15-hour online modules in SEI/ESL and SPED.

Thank you again for the opportunity to comment on the proposed revisions. If you'd like to discuss any of these comments or recommendations, please contact me or Dan Murphy, AFT MA's director of educational policy. We look forward to working with DESE to get this policy right for teachers and students.

Sincerely,



Beth Kontos
President, AFT Massachusetts

cc:

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