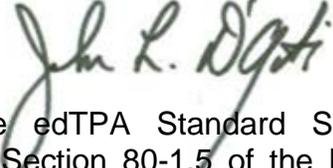




TO: The Honorable the Members of the Board of Regents

FROM: John L. D'Agati 

SUBJECT: Update on the edTPA Standard Setting Panel and Amendment to Section 80-1.5 of the Regulations of the Commissioner of Education to Extend the edTPA Safety Net and Revise the Eligibility Criteria for the Multiple Measures Review Process

DATE: December 7, 2017

AUTHORIZATION(S):  

SUMMARY

Issue for Decision (Consent Agenda)

Should the Board of Regents amend §80-1.5 of the Regulations of the Commissioner of Education to extend the edTPA Safety Net and revise the eligibility criteria for the Multiple Measures Review Process?

Reason(s) for Consideration

Review of Policy.

Proposed Handling

This item will come before the Full Board for permanent adoption at the December 2017 Board of Regents meeting. A copy of the proposed amendment is included as Attachment A.

Procedural History

A Notice of Emergency Adoption and Proposed Rule Making was published in the State Register on September 27, 2017. Following the 45-day public comment period required under the State Administrative Procedure Act, the Department received several comments on the proposed amendment. An Assessment of Public Comment is included as Attachment B. Supporting materials are available upon request from the Secretary to the Board of Regents.

Background Information

New and revised certification exams were released to the field in May 2014, including the edTPA. The edTPA, a subject-specific multi-measure performance assessment, is comprised of three tasks: (i) planning instruction and examination; (ii) instructing and engaging students in learning; and (iii) assessing student learning. The passing score, as recommended by a standard setting panel of experts in the field, was set at 41 for New York.

Commencing in May 2014, a safety net for the edTPA was established—those candidates who did not pass the edTPA could take and pass the Assessment of Teaching Skills—Written (ATS-W). Also in 2014, the “original” edTPA Task Force was established, including representatives from CUNY, SUNY, clcu, the Teacher Education Advisory Group, the United University Professions, the Professional Staff Congress, and P-12.

The edTPA Task Force was reconvened by request of members of the Board of Regents in January 2016. The Task Force was led by Dr. David Cantaffa (Assistant Provost for Educator Preparation, SUNY) and Dr. Jamie Dangler (Vice President for Academics, UUP). This work was also informed by the gathering of information across the State of New York by the Higher Education Committee chairs, Regents Cashin and Collins. Several other members of the NYS Board of Regents and the NYS Commissioner of Education participated in public forums over the past year to discuss the teacher certification exams. After several months of extensive work, the Task Force presented their final recommendations to the Board of Regents in January 2017. As related to the edTPA, the Task Force recommended the following:

- (1) That the Department establish a standard setting panel to determine if the passing score for the edTPA should be revised and gradually phased in over several years.
- (2) That the Department develop and implement a Multiple Measures Review Process (MMRP) to address cases where there is compelling evidence that the candidate is ready to teach but did not achieve a passing score on the edTPA.
- (3) That the Department work with the field, SCALE, and the testing vendor to develop and implement a process to review specific edTPA handbooks. The process would entail a review of the claims brought forth by education professionals in a specific certification area, with possible outcomes of this process as follows:
 - i. NYSED and representatives of the certification area will work with SCALE to substantively revise the applicable edTPA handbook.
 - ii. If handbook revision is not feasible for the certification area under evaluation, the Commissioner of Education may approve an alternative performance assessment for this certification area.

In addition, the Safety Net for the edTPA (originally designed to expire on June 30, 2017) was extended until the date a new passing score for the edTPA is approved by the Commissioner after a recommendation is made by a new standard setting panel or June 30, 2018, whichever is earlier.

Update on Task Force Recommendations

Since the time that the Task Force presented their recommendations, the Department convened a 31-member standard setting panel in June 2017 that reviewed the edTPA passing score. This panel was comprised of higher education faculty with experience in teacher preparation as well as P-12 educators. The panel was demographically and geographically diverse.

The standard setting panel recommended a passing score of 40 that would be implemented after a four-year phase-in period. The recommended phase-in process is described in the table below (where the passing score would begin 2 points below 40 and would eventually reach 40 after four years):

	January 1, 2018 to December 31, 2019	January 1, 2020 to December 31, 2021	January 1, 2022→
Passing Score	38	39	40
MMRP Range	36-37	37-38	38-39

Under the recommended phase-in period beginning in January 2018, the new passing score for the edTPA would be 38. When the MMRP in §80-1.5 of the Commissioner’s Regulations (which was adopted by the Board of Regents as a permanent rule at its June 2017 meeting) is fully developed and implemented, candidates who fail the edTPA with a score of 36 or 37 may take advantage of this process for a review of their score to determine if they have demonstrated to their faculty and their teacher/mentor that they have the knowledge, skills, and abilities to become a teacher of record. In addition, the Department is proposing to extend the edTPA safety net to June 30, 2018 to provide the transition from the current safety net to the establishment of the new passing score and the launch of the Multiple Measures Review Process.

The Department has also been working with representatives from clcu, CUNY, and SUNY and the edTPA Task Force co-chairs to develop policies and procedures for the MMRP established by the Board of Regents ([Multiple Measures Review Process 6/17](http://www.regents.nysed.gov/common/regents/files/617brca14.pdf)). <http://www.regents.nysed.gov/common/regents/files/617brca14.pdf>

The policies and procedures will include a description of the panelists who will review the candidates’ cases (e.g., how the panelists are selected, length of terms), the format and frequency of panel meetings, and the parameters for the candidates’ letters of recommendation. This work is in the final stage of development, and the Department plans to begin the MMRP in March 2018.

In addition, the Department has been working with representatives from clcu, CUNY, SUNY, the edTPA Task Force co-chairs, the Stanford Center for Assessment, Learning, and Equity (SCALE), and the testing vendor to develop the edTPA handbook review process. SCALE designed the edTPA handbooks and updates them annually in response to candidate performance data and feedback from educator preparation programs.

The edTPA handbook review process will include surveying faculty, staff, and administrators in New York State educator preparation programs to collect recommendations for specific changes to the edTPA handbooks with which they have significant experience. Following the collection of these recommendations, a panel of higher education representatives will review the results, determine if there is consensus regarding particular recommendations for changes to specific handbooks, and forward such recommendations to the Department. The Department will then send the recommendations to SCALE. SCALE will review the recommendations and consider whether possible updates to the edTPA handbooks are needed. If handbook revisions are not feasible for the certification area under evaluation, the Commissioner may approve an alternative performance assessment for this certification area.

Proposed Amendments

Currently, the regulations authorize candidates to take advantage of the edTPA safety net until either the date a new passing score for the edTPA is approved by the Commissioner after a recommendation is made by a new standard setting panel or until June 30, 2018, whichever is earlier. In order to help candidates transition to the MMRP the Department recommends extending the existing safety net to June 30, 2018 even though a new passing score and the MMRP will be effective before this date. Beginning on July 1, 2018, the ATS-W (the current edTPA Safety Net) will no longer be available and candidates will no longer be able to register for or take that exam. Candidates who may want to take advantage of the edTPA safety net must plan to take the edTPA and receive their edTPA scores in time to register and sit for the ATS-W. The Department will communicate the edTPA safety net extension to the field continuously through June 30, 2018. During this period, the Department will begin to implement the new Multiple Measures Review Process and make such process available to students who meet the criteria.

Section 80-1.5(d) lists one of the eligibility criteria for the Multiple Measures Review Process as having an edTPA score within one standard deviation below the passing score. A standard deviation is a variable measure that is based on candidate performance. When the edTPA standard setting panel considered the range of scores to be eligible for the Multiple Measures Review Process, the consensus of the group was to have a constant range of two points below the passing score rather than using one standard deviation, which is more variable. To ensure consistency for candidates and to make it easier for candidates to know when they can use the Multiple Measures Review Process, the Department recommends revising the current regulation to be aligned with the recommendation of the edTPA standard setting panel. Therefore, the proposed amendment revises §80-1.5 of the Commissioner's Regulations to change the eligibility

criteria for the Multiple Measure Review Process from “one standard deviation below the passing score” to “two points below the passing score.”

Related Regents Items

April 2016: [Extension of safety nets for those taking new certification exams](http://www.regents.nysed.gov/common/regents/files/416hea2.pdf)
<http://www.regents.nysed.gov/common/regents/files/416hea2.pdf>

January 2017: [Update on edTPA task force and certification requirements](https://www.regents.nysed.gov/common/regents/files/117hed2.pdf)
<https://www.regents.nysed.gov/common/regents/files/117hed2.pdf>

March 2017: [Multiple measures review process for edTPA memo](https://www.regents.nysed.gov/common/regents/files/317hed1.pdf)
<https://www.regents.nysed.gov/common/regents/files/317hed1.pdf>

June 2017: [Multiple measures review process for edTPA memo](http://www.regents.nysed.gov/common/regents/files/617brca14.pdf)
<http://www.regents.nysed.gov/common/regents/files/617brca14.pdf>

September 2017: [Update on Standard Setting Committee and Extend edTPA Safety Net](https://www.regents.nysed.gov/common/regents/files/917hea1.pdf)
<https://www.regents.nysed.gov/common/regents/files/917hea1.pdf>

November 2017: [Update on Standard Setting Committee and Extend edTPA Safety Net](http://www.regents.nysed.gov/common/regents/files/1117brca2.pdf)
<http://www.regents.nysed.gov/common/regents/files/1117brca2.pdf>

Recommendation

It is recommended that the Board of Regents take the following action:

VOTED: That §80-1.5 of the Regulations of the Commissioner of Education be amended, as submitted, effective December 27, 2017.

Timetable for Implementation

If adopted at the December Regents meeting, the proposed amendment will become effective as a permanent rule on December 27, 2017.

AMENDMENT TO THE REGULATIONS OF THE COMMISSIONER OF EDUCATION

Pursuant to sections 2017, 215, 3001, 3003 and 3009 of the Education Law.

1. Subdivision (c) of section 80-1.5 of the Regulations of the Commissioner of Education shall be amended, effective September 12, 2017, to be read as follows:

(c) Except as otherwise prescribed in this subdivision, notwithstanding any applicable provisions of Subparts 80-1, 80-3, 80-4 and 80-5 of this Part or any other provision of rule or regulation to the contrary, a candidate who applies for and meets all the requirements for a certificate on or before June 30, 2018, except that such candidate does not achieve a satisfactory level of performance on one or more of the new certification examinations the teacher performance assessment or the revised content specialty examination(s), as prescribed by the commissioner, that is/are required for the certificate title sought, may instead use one or more of the following safety net options, in lieu of taking, retaking one or more of such new and/or revised certification examinations:

(1) Teacher performance assessment. A candidate who takes and fails to achieve a satisfactory level of performance on the teacher performance assessment (after completing and submitting for scoring the teacher performance assessment), may, in lieu of retaking the teacher performance assessment:

(i) receive a satisfactory score on the written assessment of teaching skills after receipt of his/her score on the teacher performance assessment and prior to [either the date a new passing score for the edTPA is approved by the commissioner after a recommendation is made by a new standard setting panel or] June 30, 2018[, whichever is earlier]; or

(ii) pass the written assessment of teaching skills on or before April 30, 2014 (before the new certification examination requirements became effective), provided the candidate has taken and failed the teacher performance assessment prior to [either the date a new passing score for the edTPA is approved by the commissioner after a recommendation is made by a new standard setting panel or] June 30, 2018[, whichever is earlier].

2. Subdivision (d) of section 80-1.5 of the Regulations of the Commissioner of Education shall be amended, effective September 12, 2017, to be read as follows:

(d) Multiple Measures Review Process for the edTPA.

(1) A candidate may apply for a waiver of the edTPA requirement on or after the effective date of this section through a multiple-measures review process. Provided however, that this process will only apply if and when a new standard setting panel has been convened and makes a recommendation to the Commissioner for a new passing score for the edTPA and such score has been approved by the Commissioner for use with the edTPA, and the candidate meets the requirements set forth in paragraph (2) of this subdivision.

(2) To be eligible for a waiver of the requirement for the edTPA through the multiple-measures review process, a candidate shall:

(i) receive a score within [one standard deviation] two points below the new passing score set by the standard setting panel, as determined by the Commissioner;

(ii) . . .

(iii) . . .

(iv) . . .

(3) . . .

ASSESSMENT OF PUBLIC COMMENT

Since publication of Emergency Adoption and Proposed Rule Making in the State Register on September 27, 2017, the State Education Department (SED) received several comments:

1. COMMENT:

One commenter raised a concern related to the certification exams because he/she is pursuing a teaching certificate but cannot pass the exams.

DEPARTMENT RESPONSE:

The intent behind the regulatory changes related to the edTPA is to make implementation of the exam in New York more effective and to address significant concerns raised by test takers and the field. The concerns included feedback from candidates related to the difficulty of the exams. The recommendations of the Task Force also included actions such as eliminating the Academic Literacy Skills Test (ALST), extending the safety net for those who cannot pass the edTPA until June 30, 2018, reviewing the edTPA passing score, and creating a Multiple Measures Review Process for those candidates who fall within 2 points of the new edTPA passing score but meet certain other requirements demonstrating that they have the knowledge, skills, and abilities to step into the classroom. The new passing score for the edTPA, beginning on January 1, 2018, will be 38, which is lower than the current passing score of 41. Ultimately, under the recommended phase-in period, the new passing score will be a 40 beginning on January 1, 2022. In addition, the safety nets for the EAS and the more recently released and/or revised content specialty tests have been extended.

2. COMMENT:

Several commenters ask that the Board of Regents reconsider the decision to lower the requirements for teacher certification. The concerns raised include the negative impact this would have on students and that teachers leave the profession due to deplorable teaching conditions, not because of the exams.

DEPARTMENT RESPONSE:

The intent behind the regulatory changes related to the edTPA was not to lower the standards for teacher certification in New York, but to make the implementation of the exam in New York more effective, and to address significant concerns raised by the field. The decision to lower the edTPA cut score (as well as the process to phase in a higher cut score) was a result of the edTPA standard setting panel convened in June 2017. This panel included both P-20 and higher education stakeholders, and was geographically and demographically representative of New York State. This panel of experts ultimately recommended the new edTPA cut score, phase-in process, and cut-off for the Multiple Measures Review Process which they decided will still ensure that a teacher certification candidate possess the requisite knowledge, skills, and abilities to become a teacher of record.

3. COMMENT:

One commenter expressed frustration that the safety net exams are no longer available, that the exams are too costly, that the edTPA safety net (the ALST) is too costly, that too much time is spent studying for the exams, and that New York is facing a teacher shortage.

DEPARTMENT RESPONSE:

At this time, the safety net for the edTPA (which is the Assessment of Teaching Skills-Written [ATS-W]) is available until June 30, 2018. The safety net exams for most of the recently developed content specialty tests are still available as well, and for a detailed breakdown of the safety net dates for all content specialty tests, please see: <http://www.highered.nysed.gov/tcert/certificate/certexamsafetynetchart.html>.

4. COMMENT:

One commenter asked that the Department review and revise the pathways to obtain a teaching certificate in an additional science subject, noting that there should be an easier way for a teacher of one of the sciences to obtain an additional certificate in another science.

DEPARTMENT RESPONSE:

While this is outside the scope of the regulation change related to the edTPA, the Department is currently reviewing all certification pathways including the sciences.

5. COMMENT:

One commenter expressed concern that the Board of Regents is lowering standards and making it easier to become a teacher, but also noted that it appears that the intent is to create multiple pathways for teacher certification. The commenter was concerned that these multiple pathways do not necessarily help and that all pathways may not lead to the same quality of teacher. Last, the commenter is concerned that this could be a cause of the teacher shortage by discouraging candidates from entering the profession.

DEPARTMENT RESPONSE:

See Response to Comment #2. The intent behind the regulatory changes related to the edTPA was not to lower the standards for teacher certification in New York, but to make the implementation of the exam in New York more effective, and to address significant concerns raised by the field. In response to the “multiple pathways” concern, the Department acknowledges that there are multiple pathways that one may pursue to obtain a teaching certificate (for example, individual evaluation pathways, pathways for those with postsecondary teaching experience, and transitional program pathways). However, this flexibility was intentional because the Department recognizes that one single pathway does not fit all candidates pursuing a certificate. The Department works to ensure that each pathway leading to a certificate in the classroom teaching service leads to a certified teacher who possesses the minimum knowledge, skills, and abilities to effectively teach students in their certificate area.

6. COMMENT:

Several commenters disagree with lowering standards for teacher certification as a solution to the teacher shortage and suggest that the Department solve this problem by making it more desirable to become a teacher, increasing teacher salaries, and creating better working conditions for teachers.

DEPARTMENT RESPONSE:

Please see response to COMMENT #2. While outside the scope of this regulation, the Department also recognizes that there are shortages in certain certification titles and is exploring ways to address these shortages.

7. COMMENT:

Several commenters disagree with the decision of the Board of Regents to lower the standards for teacher certification.

DEPARTMENT RESPONSE:

Please see response to COMMENT #2.

8. COMMENT:

One commenter disagrees with the decision of the Board of Regents to lower standards for teacher certification and suggests the creation of a pathway to allow a “visiting professional” status for accomplished and retired professionals to become teachers.

DEPARTMENT RESPONSE:

In response to the comment related to lowering the standards, please see response to COMMENT #2. In response to the suggestion of a pathway for professionals to pursue a teaching certificate, there is a Transitional G pathway available for individuals who hold a graduate degree in any subject who have had teaching experience at the college level in such subject. This pathway was formerly only open to those holding a graduate degree in a STEM subject, but the Department proposed a change at the November 2017 Board of Regents meeting to open this option up to all subjects.

9. COMMENT:

One commenter with an expired conditional initial certificate asked that the Board of Regents to consider making it easier for teachers who have lost their license to regain their license, allowing good teachers to re-enter the workforce.

DEPARTMENT RESPONSE:

While this comment is outside the scope of the proposed amendment, a candidate with an expired conditional initial teaching certificate would need to re-take the applicable content specialty test and the EAS. While the candidate will also have to take the edTPA, it was not required for the conditional initial and so would not be a re-take. Lastly, the ALST is no longer a certification examination requirement and therefore this examination would not have to be re-taken.

10. COMMENT:

Several commenters expressed concern related to the process of state-to-state reciprocity of teaching certificates. The commenter argues that rather than lowering the standards for candidates entering the profession, the Department should make it easier for those with a teaching certificate and experience from another state to become a certified teacher in New York. The commenter also suggests that the Department look to other states that have exceptional standards for educators.

DEPARTMENT RESPONSE:

The Department has recently examined the endorsement pathways for individuals who hold a teaching certificate from another state who are pursuing certification in New York. If an individual has a certificate from another state and three years of teaching under such certificate in a public school (within the last five years) along with ratings of effective or highly effective, along with a bachelor's degree and at least a 2.5 GPA, he/she may pursue endorsement of his/her teaching certificate without having to take and pass the New York State teaching certification exams.

11. COMMENT:

One commenter acknowledged that there may be a teacher shortage in some areas, but that there is a surplus of teachers in some certification areas. The commenter suggests that the Department address this issue as well as the perceived shortage.

DEPARTMENT RESPONSE:

See Response to COMMENT #6.

12. COMMENT:

One commenter suggested that the Board of Regents eliminate the edTPA and replace this requirement with more time spent in the classroom.

DEPARTMENT RESPONSE:

See Response to COMMENT #1. In addition, by request of the Board of Regents, the Department convened a Clinical Practice Workgroup that has been tasked with reviewing all requirements related to the field experience and student teaching requirements applicable to all educator preparation programs to determine if additional time is needed in the classroom. This workgroup contains both P-12 and higher education experts, faculty, teachers, and administration. The workgroup plans to have recommendations to present to the Board of Regents in early 2018.

13. COMMENT:

One commenter expressed concern that standards for teacher certification are being lowered, and that this is a continuation of bad concepts being implemented by the New York State Education Department.

DEPARTMENT RESPONSE: See Response to COMMENT #2.

14. COMMENT:

One commenter does not support lessening the requirements for teacher certification and in fact supports an initiative to strengthen teacher certification requirements. The commenter explains that it is the paperwork, meetings, and “bureaucracy” that is stifling the teaching profession and pushing current teachers out of the profession.

DEPARTMENT RESPONSE:

In response to the concern that the Department is lowering standards for teacher certification, please see response to COMMENT #2. In addition, the Department has made efforts to strengthen teacher certification requirements through initiatives such as the Clinical Practice Workgroup. See Response to COMMENT #13.

15. COMMENT:

One commenter disagrees with lowering the standards for teacher certification. The commenter explained that teachers face poor public perception and a lack of respect which influences the number of individuals pursuing the profession. The commenter suggests increasing the demands for teacher certification to send the message that only the most qualified candidates can become teachers in New York.

DEPARTMENT RESPONSE:

Please see response to COMMENT #2 and COMMENT #14 above.

16. COMMENT:

One commenter explained that her daughter wishes to be a teacher, but has test anxiety and wishes there were no tests.

DEPARTMENT RESPONSE:

Please see response to COMMENT #1. In addition, NYSTCE offers alternative testing arrangements for those test takers with disabilities who would not be able to take the test under standard conditions. Please see:

http://www.nystce.nesinc.com/TestView.aspx?f=NYCBT_RequestingAlternativeTestingArrangements.html&t=NY028 for additional information about requesting alternative testing arrangements.

17. COMMENT:

One commenter suggests that the Board of Regents eliminate the edTPA because it is not practical and because too much time is spent in the classroom preparing for it.

DEPARTMENT RESPONSE:

Please see response to COMMENT #1. In addition, this was one of the concerns brought to the edTPA Task Force and considered by the Task Force, which ultimately presented final recommendations to the Board of Regents which included the regulation changes related to the edTPA cut score and implementation of the Multiple Measures Review Process.

18. COMMENT:

One commenter expressed concern that the regulation change is unfair to those who have already paid to take the tests.

DEPARTMENT RESPONSE:

See Response to COMMENT #1. These changes were made based on recommendations from the edTPA Task Force, which includes representatives from

CUNY, SUNY, clcu, the Teacher Education Advisory Group, the United University Professions, the Professional Staff Congress and P-12.

19. COMMENT:

One commenter expressed concern that “dumbing down” the profession is not the way to encourage new teachers to enter the profession and encourage growth in the teaching profession. The commenter suggests that the Board of Regents and the Department determine why there is a teacher shortage and why young teachers leave the profession. The commenter suggests that the public perception of the teaching profession may be the cause.

DEPARTMENT RESPONSE:

Please see Responses to COMMENTS #2 and #6.

20. COMMENT:

One commenter expressed his/her desire to move back to New York but explains that the requirement to obtain a Master’s degree to become a certified teacher along with the cost of living in New York is prohibitive.

DEPARTMENT RESPONSE:

While outside the scope of the proposed amendment, after obtaining an Initial Certificate in the classroom teaching service, a candidate has five years to obtain a Master’s degree. In addition, candidates may get an extension on their Initial Certificate for an additional five years, ultimately giving them ten years within which to complete the Master’s degree requirement. The Department believes this is a sufficient amount of time to obtain a Master’s degree.

21. COMMENT:

One commenter expressed support to the changes related to the edTPA because changes to the edTPA are needed, but expressed concern that the certification tests have hindered teacher certification including colleagues of the commenter.

DEPARTMENT RESPONSE:

To the extent that the comment is supportive, no comment is necessary. In response to the concern related to teacher certification, the work of the edTPA Task Force focused on responding to these concerns. To address these concerns, the Task Force developed a set of recommendations related to all certification exams, which were presented to the Board of Regents, and have been implemented and/or are in the process of being implemented. These recommended included actions such as eliminating the Academic Literacy Skills Test (ALST), extending the safety net for those who cannot pass the edTPA until June 30, 2018, reviewing the edTPA passing score, and creating a Multiple Measures Review Process for those candidates who fall within 2 points of the new edTPA passing score but meet certain other requirements demonstrating that they have the knowledge, skills, and abilities to step into the classroom. For the full Task Force Report, please see:

<https://www.regents.nysed.gov/common/regents/files/117hed2.pdf>.

22. COMMENT:

One commenter expressed concern that decreasing qualifying scores (passing scores on the edTPA) is not the way to address issues in the teaching profession. The commenter suggests that the Department look at the “untapped resource” of young men and potentially creating a campaign to encourage young men to enter the profession.

DEPARTMENT RESPONSE:

It has been, and continues to be, a mission of the Department to attract as many highly qualified and diverse candidates to the educator workforce as possible. Under New York State's ESSA Plan, the Department will be working to leverage P-20 partnerships to enhance the quality and diversity of the educator workforce.

23. COMMENT:

One commenter expressed concern that lowering the edTPA score to a 39 will not make a difference because there is no exam that can show teacher effectiveness.

DEPARTMENT RESPONSE:

The decision to phase in the edTPA cut score was a result of the edTPA standard setting panel convened in June 2017. This panel included both P-20 and higher education stakeholders, and was geographically and demographically representative of New York State. This panel of experts ultimately recommended the new edTPA cut score, phase-in process, and cut-off for the Multiple Measures Review Process which they decided will still ensure that a teacher certification candidate possess the requisite knowledge, skills, and abilities to become a teacher of record.

24. COMMENT:

One commenter expressed concern that the edTPA is very costly and time consuming, does not prove teaching ability, and the internship required in education preparation programs is enough to prove teaching effectiveness.

DEPARTMENT RESPONSE:

In response to the concerns raised related to the time and cost of the edTPA, the edTPA Task Force was convened to specifically review concerns related to all of the certification exams. Also, please see responses to COMMENTS # 1 and #3. In

response to the comment related to the internship, the edTPA is meant to be embedded in a teacher preparation program, and to be completed during a student teaching placement. Rather than being redundant, the edTPA is meant to enhance and assess the skills gained during a placement.

25. COMMENT:

The Department received several comments supporting the proposed amendments.

DEPARTMENT RESPONSE:

No response is necessary because the comments were supportive.

26. COMMENT:

One commenter raised concerns related to the teacher certification process including: teacher shortage, the poor retirement system, APPR, the registration process for teachers, the cost of obtaining a Master's degree, the cost of the edTPA, the fingerprinting process, and over-testing in schools.

DEPARTMENT RESPONSE:

In response to the teacher shortage, the Department has been working to explore ways to address the perceived shortages while maintaining the high quality of the teaching profession. In response to the concerns related to the retirement system, APPR, the registration process, the cost of obtaining a Master's degree, the fingerprinting process, and over-testing in schools, these concerns are outside the scope of the proposed amendments. Last, in response to the cost of the edTPA, the total cost of the certification exams was one concern addressed by the edTPA Task Force. See response to COMMENT #3.