



219 North Main Street, Suite 402  
Barre, VT 05641 (p) 802-479-1360 | (f) 802-479-1822

## Responsiveness Summary

### VSBPE Rule:

5440-15 Social Studies

“ 3. A major in history, political science, economics, geography, or other social science disciplines such as sociology, psychology, global studies, anthropology and world religions. The candidate must successfully complete a minimum of one course in each of the following: American History, World History, Economics, Geography, Political Science and either Psychology or Sociology.”

### Public Comment:

Mary Beth McNulty, Associate Director  
Teacher Apprenticeship Program, Champlain College

The requirement for **social studies** candidates to complete specific coursework is not in the spirit of the endorsement standards themselves. We are trying to understand what problem this new requirement is meant to solve.

As an alternative route program, our candidates work to document competency in their endorsement area through a variety of means, not just through coursework. We, like other alternative routes, conduct a rigorous assessment of our candidates' meeting these requirements: this assessment process has been approved by two ROPA review teams. Praxis requirements further assure that all social studies candidates possess the necessary content knowledge in each of these areas.

Finally, adopting this change would take the social studies endorsement out of alignment with all other endorsement areas, which do not include specific coursework requirements, thus creating an inequity in the licensure process.

### AOE Response:

Terry Reilly, Educator Quality Pre-service Programs Coordinator

The identified problem with the current endorsement as written allows Teacher Preparation Programs to recommend candidates for licensure lacking essential content knowledge (A degree in Philosophy without any history, economics, or US World History for example). Revisions to this endorsement were based on currently practicing Level II Licensed Social



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Studies educators in Vermont, Educator Preparation Program faculty, and review of the national standards and other Educator Quality Standards in the North East.

Agency recommendation is to submit rule as adopted by the VSBPE on 3/28/18.



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## VSBPE Rule:

5440-02 The holder is authorized to teach art and design in grades PK-8, 5-12, or PK-12, based on practicum and student teaching experience. Revised March 2018.

## Public Comment:

Mary Beth McNulty, Associate Director  
Teacher Apprenticeship Program, Champlain College

Proposed revision: "A minimum of a practicum, or the equivalent, in art education at the elementary (PK-8) or middle/secondary (5-12) instructional level, depending on the authorization sought. For the full PK-12 authorization, a minimum of a practicum, or the equivalent, in art education at both the PK-8 and 5-12 instructional levels is required."

TAP Question/Comment: Does this mean that a candidate student teaching art in at least in grades 5-8, or even if they just teach grade 5 as it meets both of these level requirements, could get the full PK-12 endorsement without a second placement?

Furthermore the proposed music practicum requirements have not been revised with the same grade level breakdown. Can you explain this inconsistency?

◦Music endorsement revisions read: "A minimum of a practicum, or the equivalent, in music education at the elementary (PK-6) or middle/secondary (7-12) instructional level, depending on the authorization sought. For the full PK-12 authorization, a minimum of a practicum, or the equivalent, in music education at: both the PK-6 and 7-12 instructional levels is required."

## AOE Response:

Debora Price, Division Director of Educator Quality  
Terry Reilly, Educator Quality Pre-service Programs Coordinator

Instructional levels were changed to reflect current PK-12 settings across Vermont. Elementary Schools include the following instructional levels: PK/K-4, PK/K-6, PK/K-8; Middle Schools: 5-8, 6-8, 7-8; High Schools range from 7-12 (Junior High 7-8), 9-12.

No, a candidate cannot student teach in 5th grade only and get the full instructional level. The  
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intent of this endorsement is to allow flexibility within the current wide range of Vermont educational settings. For example, this eliminates the need for multiple art educators in an elementary/middle school setting.\*

\*Technical assistance regarding this change in instructional level wording needs to be provided to Teacher Preparation Programs and specifically clarified in the ROPA handbook to ensure appropriate recommendations are made.

If the student teaching occurred in a K-12 public school, and the practicum prior to student teaching included a K-12 range, then the candidate would be eligible for the full instructional level. However, if the practicum was in a limited instructional level, than an additional practicum is necessary for the full instructional range of the endorsement

The Music endorsement was intended to be revised to be the same as Art. This was a clerical error and we thank you for bringing this to our attention.



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## VSBPE Rule:

5440-05 - English  
5440-15 - Social Studies  
5440-19A - Middle Grades English  
5440-19D - Middle Grades Social Studies

## Public Comment:

Mary Beth McNulty, Associate Director  
Teacher Apprenticeship Program, Champlain College

The newly revised secondary ELA endorsement and social studies endorsement do not align with their respective middle grades endorsement. Is there a timeline for revising them?

Endorsement standards (e.g. English, middle grades) continue to include standards that are redundant with the Core Teaching Standards and excessive. The result is that in many preparation programs candidates must spend countless hours documenting standards that they have already documented for the Vermont Licensure Portfolio.

Example: The Music Endorsement standards require that candidates use “a variety of appropriate methods, including student self-assessment, to assess students’ musical development, and uses assessment results to evaluate the effectiveness of one’s teaching and curriculum. The VLP also require:

VLP PC 6.1 Candidates implement multiple methods of assessment to monitor learner progress to inform instructional practice.

VLP PC 6.2 Candidates analyze an individual student’s work over time using multiple methods of assessment to adjust instruction.

## AOE Response:

Debra Price, Division Director of Educator Quality  
Based on this comment, we reviewed the content standards in the Middle Grade endorsement and identified that when 7-12 content endorsements were revised those revisions were not updated in the knowledge and performance standards for the Middle Grades. This clerical



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error will be addressed by August 1, 2018.

Terry Reilly, Educator Quality Pre-service Programs Coordinator

The Board has acknowledged the redundancy with endorsement standards and core teaching standards. The Agency has, and will continue to during the revision process, address redundancies.



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## VSBPE Rule:

5443.1 Additional Endorsements

## Public Comment:

To: The Vermont Standards Board for Professional Educators (VSBPE)  
From: Dr. Katy Culpo, Associate Professor Castleton University  
Date: May 25, 2018  
RE: Proposed changes to Rule 5443.1 Additional Endorsement

I am writing to request that VSBPE Rule 5443.1 NOT be changed. I believe the proposed change will create an unnecessary barrier to receiving additional endorsements, creating more hardship to schools having qualified teachers, and/or qualified teachers that can fulfill multiple roles.

The proposed change is to only count coursework for which the applicant received a "B" or better (rather than a "C") toward the requirements for an additional endorsement through transcript review. VSBPE Rule 5247 currently reads as follows in the proposed changes-

5443 Additional Endorsements

5443.1 The holder of any license who wishes to qualify for an additional endorsement via transcript review shall present evidence of meeting the knowledge and performance standards and additional requirements, if any, of the endorsement.

A minimum of eighteen (18) credit hours, or as specified by the endorsement is required. Only coursework for which the applicant received a grade of "BC" or better may be counted toward the requirements for any additional endorsement.

The applicant shall meet requirements for updated knowledge and skills as established by Standards Board policy.

**Rational for no change:** The applicant for an additional endorsement through transcript review has a license, meaning they have received a 3.0 GPA and have met Praxis I and II requirements – they have demonstrated their academic capability. When current teachers apply for an additional endorsement, they are submitting undergraduate coursework/transcripts to meet some of the requirements for the additional endorsement. Coursework the applicant is submitting may be classes they took as first or second year undergraduate students, when they were 18 or 19 years old. A "C" at the time may have been an accomplishment. Keep in mind they ultimately achieved a 3.0 to receive an initial license in Vermont – they are academically competent.



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**Immediate Negative Impact:** Currently at Castleton University, many of our Physical Education licensure students also pursue our Minor in School Health Education. The School Health Education minor is a package of courses that prepare students to apply for an additional Health Education endorsement upon receiving their initial PE license. The ultimate result is a dual licensed professional in Health and Physical Education, which is the current need/demand in most Vermont schools for hiring. Health Education is also an identified teacher shortage area in Vermont.

**Example #1:** The Health Education transcript review worksheet includes coursework in “human body structure and functioning.” Most PE majors will use their Anatomy and Physiology I and II coursework for transcript review, typically taken their second year of college. Trust me when I say this, a “C” is an accomplishment for many students their sophomore year in college taking these courses. My fear is that most students will NOT retake this course for a “B” or better (the proposed Rule change), and hence will not persist to receive a second endorsement in Health Education in Vermont.

**Example #2:** The Health Education transcript review worksheet includes coursework in “Early childhood through early adolescent development (for PK-6) AND/OR early adolescent through adult development (for 7-12).” Most PE majors will use their Child and Adolescent Psychology or Human Growth and Development coursework for transcript review, typically taken their first or second year of college. There were a few years here at Castleton that the particular teacher of one of these classes was very tough, and we were happy that some of our students were making it through with a C. Again, my fear with this proposed Rule change is that these students would not retake this course for a “B”, and hence will not persist to receive a second endorsement in Health Education.

These are just a couple very specific examples of the negative impact of changing the requirement of a “C” to a “B” for coursework in the transcript review process.

I noticed the “C” to “B” changes throughout the current proposed Rule changes, and I understand this for graduate courses taken for relicensing and other purposes in the here and now, current life of the teacher. However, coursework submitted for an additional endorsement through transcript review should not be held to the same “B” standard, as some of the submitted coursework is undergraduate work. Remember, academic capacity of the teacher has already been demonstrated through receiving an initial license, and most additional endorsements require a content Praxis II test.

For the reasons put forth, I do not believe the proposed Rule 5443.1 will have a positive impact on preparing/providing qualified teachers in Vermont schools. In fact, I believe it will do the opposite.





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Thank you very much for your consideration.

Respectfully Submitted,

Dr. Katy Culp  
Associate Professor, Castleton University  
Department of Health, Human Movement, and Sport  
Coordinator Health Education Programs

### AOE Response:

Ron Ryan, Educator Quality Program Manager for Educator Licensing  
Cathy Wilkins, Educator Quality, Lead Transcript Review Licensing Specialist  
Deb Giles, Educator Quality, Education Consultant for L/RSB

Agency recommendation is to submit rule as adopted by the VSBPE on 2/14/18.  
There are options available to the educator who does not meet this requirement including Peer Review.



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## VSBPE Rule:

5247.4 Waiver of Praxis Core Series Requirement

## Public Comment:

To: The Vermont Standards Board for Professional Educators (VSBPE)  
From: Dr. Katy Culpo, Associate Professor Castleton University  
Date: May 22, 2018  
RE: Addition to Rule 5247 Waiver of Praxis Core Series Requirement

I am writing to request provisions be added to VSBPE Rule 5247 that would allow approved teacher preparation programs to request Praxis waivers for prospective teachers and that the issued license NOT be restricted to a particular school or district. VSBPE Rule 5247 currently reads as follows -

### 5247 Waiver of Praxis Core Series Requirement

- 5247.1 A superintendent may apply for the waiver on behalf of the school district.
- 5247.2 The school district would need to demonstrate that not being given a waiver would substantially inhibit the district's ability to carry out "its locally established objectives."
- 5247.3 The prospective teacher on whose behalf the waiver is being requested must document that he/she:
  - a) has undertaken additional efforts to acquire knowledge and skills necessary such as tutoring and courses,
  - b) has an identified and documented disability and has exhausted all ETS procedures for accommodations for that disability; and
  - c) has taken the exam a minimum of three times without being able to meet the required cut scores.
- 5247.4 If a - c are met and the VSBPE or the Office, its designee finds that the candidate is otherwise qualified, the Educator Quality Division's Licensing Office will issue a license that is restricted to teaching in the school building(s) of the district making the waiver request.

Meet Fall 2017 Castleton University Health and Physical Education Major (I am not sharing this student's name (although she was okay if I did), and I have permission to share all her profile information.)



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GPA - 3.7

Recipient of SHAPE-VT Outstanding Future Professional Award Fall 2016; Eastern District SHAPE Outstanding Future Professional Award Spring 2017.

VT native, member CU Soccer Team, multiple leadership positions and involvement on and off campus. (resume attached)

Praxis I

Reading - passed

Writing - failed (taken three times) missed by 6

Math - failed (taken three times) missed by 22

Praxis II PE - passed

Praxis II Health - failed (taken twice) missed by 9

This student has a documented learning disability - dyslexia. She has worked diligently with the CU Academic Support Center Director to receive testing accommodations and prepare for these tests. Unfortunately, additional testing time has not compensated for her learning disability on these standardized tests - particularly math, as evidenced by her low test scores.

This teacher candidate had outstanding recommendations from her mentor teachers during her student teaching experience. Her student teaching portfolio is an outstanding representation of her demonstrated proficiency in the Vermont Core Teaching Standards and her promise as a future educator in Vermont schools. She is a Vermont native that wants to stay and teach health and physical education in Vermont... this should not be so difficult for her. It also seems wrong that she would be limited to teach in schools that apply for waivers on her behalf. She has worked very hard to overcome her learning challenges, has demonstrated her capacity to be an outstanding teacher, and as a result she should be granted a license and free to apply for jobs where she wants within Vermont.

The good news, she easily secured a position for the 2018-19 academic school year. When I spoke with the building principal, she was impressed with her composure, maturity, and her great rapport with the students and command of the classroom.

My question/concern I bring to the VSBPE is this... why should this teacher candidate, each time she applies for a job, have to rehash and explain to prospective employers her learning disability history and inability to pass the praxis exam? She has demonstrated competency and proficiency as an entry-level teacher through her portfolio and student teaching experience. Why should her license be restricted to a school or district? I strongly request that the VSBPE provide a provision in Rule 5247 that approved teacher preparation programs may apply for the

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Praxis waiver on behalf of the teacher candidate, AND that the issued license NOT be restrictive. While I predict that applications for such waivers would be small in numbers, the case of this particular student illustrates the need for such a waiver provision for approved teacher preparation programs to exist within the VSBPE Rules.

The student presented to you today is worthy of such a Praxis test waiver to receive her license, free of restrictions.

Thank you very much for your consideration.

Respectfully Submitted,

Dr. Katy Culp  
Associate Professor, Castleton University  
Department of Health, Human Movement, and Sport  
Coordinator Health Education Programs

### AOE Response:

Debora Price, Division Director of Educator Quality  
Terry Reilly, Educator Quality Pre-Service Program Coordinator  
Ron Ryan, Educator Quality Program Manager for Educator Licensing

Agency recommends no change to the current Praxis Core Waiver Rule, 5247.4. A Graduate of an Educator Preparation Program without a recommendation for licensure can still access this waiver upon application from a Superintendent who has employed the individual.



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### **VSBPE Rule:**

5951, 5952, VSBPE Waiver Rules

### **Public Comment:**

Carol Marold, Barre Supervisory Union

I am writing in support of the Agency's ability to issue waiver requests. When we request a waiver, it is normally time sensitive. The current process can be slower than needed because of meetings scheduled to review/approve request.

### **AOE Response:**

Thank you for your comment.