

**ARKANSAS DEPARTMENT OF EDUCATION DIVISION OF ELEMENTARY AND SECONDARY
EDUCATION RULES GOVERNING EDUCATOR LICENSURE**

**PUBLIC COMMENTS AND RESPONSES OF THE DIVISION OF ELEMENTARY AND
SECONDARY EDUCATION**

COMMENT 1

Rebecca Miller Rice: Bureau of Legislative Research November 13, 2019

Comments and Division Response in Bold:

(1) Section 3-1.03.1.4 – Arkansas Code Annotated § 6-15-1705 appears to continue to reference “parental involvement.” Should the statute referenced be Ark. Code Ann. § 6-15-1703, which was amended by Act 666 of 2019, to require professional development training in family and community engagement, which training must be verified before an initial teaching license shall be issued in accord with Ark. Code Ann. § 6-17-709, as amended by Act 666?

Comment considered. Non-substantive change made.

(2) Section 3-1.03.1.7 – The summary provided states that the provision for “human trafficking awareness” is not in law, but that EPPs wanted it included; however, doesn’t Act 666 of 2019 require the Division to verify that an applicant for an initial teaching license has obtained the required professional development concerning that area?

Comment considered. Not required by law but added by rule. No change made.

(3) Section 3-1.05 – Should the references be to the Division of Arkansas States Police, in accord with Ark. Code Ann. § 6-17-410(a)(1)(A)(i), as amended by Act 910 of 2019, § 1383?

Comment considered. Non-substantive change made.

(4) Section 3-2.01 – Should the term “educator preparation” follow “IHE based” before program to be clear as to the program?

Comment considered: Non-substantive change made.

(5) Section 3-2.01.4 – Should the “and” be removed? Can an EPP be accredited and comply and “if not accredited . . . be identified?”

Comment considered. Non-substantive change made.

(6) Section 4-11.01.1 – Is something missing, or is there an extra “and”? The markup reflects that the section will read that the applicant may apply, providing: “Documentation of three (3) years of licensed teaching experience, which may include teaching with a provisional license and in good standing; and”? This seems unclear to me.

Comment considered. Non-substantive change made. Corrected for clarity. “Documentation of three (3) years of licensed teaching experience, which may include teaching with a provisional license that is in good standing; and”

(7) Section 4-11.03.3 – Are the subsections under this section misnumbered after 4-11.03.3.1?

Comment Considered. Non-substantive change made.

(8) Section 5-1.04 – Is the markup of this section correct? Should there be a comma, rather than a period, after “renewal” in the underlined change? If not, the second portion of the section reads incomplete?

Comment considered. Non-substantive change made.

(9) Section 5-2.02.3.3 – Section contains a reference to “Department Division.”

Comment considered, non-substantive change made.

(10) Section 5-4.05 – Is there a word missing at the end? “Actions”?

Comment considered, non-substantive change made.

(11) Section 5-6.03 – This section appears premised on Ark. Code Ann. § 6-15-1004(a)(2), which appears to provide that if no assessment for a new licensure area for subject matter content is available, the Division may request that the State Board approve an alternative method of demonstrating subject matter content. The rule, however, states that the Division may use “a current Principles of Learning and Teaching exam” or may request the State Board approve an alternative method. Is there a reason that the rule does not mirror the statute? (Also, the rule contains a reference to “Department Division.”)

The Principles of Learning and Teaching exam is an alternative assessment approved by the State Board so it is one assessment that can be used to demonstrate subject matter content. Ark. Code Ann. § 6-15-1004(a)(1) allows the State Board to promulgate rules on which assessments to use and Ark. Code Ann. § 6-15-1004(a)(2) allows other methods when there is no assessment. This section allows the State Board to determine and accept what an identified assessment may be.

Comment Considered: No Change Made

(12) Section 7-7.03 – Does this section end on page 70? Page 71 is blank, but the section lacks a period on page 70.

Comment considered, non-substantive change made.

(13) In the Division’s summary of the rule and the Division’s questionnaire, it states that changes were made to the rules based on Acts 83 and 757 of 2019. Can you please be more precise as to (a) which sections of those acts were incorporated and (b) which sections of the rules those changes can be found?

Act 83 can be found in Chapter 5-2.03

Act 757 amended Ark. Code. Ann. 6-17-402 which allows the State Board to create rules for licensure. Section 34 of Act 757 changed Ark. Code Ann. 6-17-402(j) from “Early Childhood” to “Elementary Education (K-6)” Included it to distinguish “Early Childhood” as P-4 while Elementary Education (K-6) is K-6.

COMMENT 2

Dr. Kimberly Flowers, Harding, November 4, 2019

Comment:

Since DESE is transitioning to the new terminology of principal, superintendent, special education administration, etc., should all references to the current building-level administrator, district-level administrator, and curriculum program administrator: special education and curriculum & instruction also be revised in the regulations for consistency and alignment?

Division Response

Those terms only apply to people graduating from 2020 leadership programs so new terms will be used in next rules.

Comment Considered. No change made

COMMENT 3

Nicolas Williams, November 1, 2019

Comment:

Hello, I currently hold a provisional license in 4-8 English language arts and teach this subject area at Mann Magnet Middle School with the Little Rock School District. I am in my fourth year teaching this area and have represented my school as Teacher of the Year and was most recently named an Amazing Educator by Little Rock Family.

I would like to attain my standard license in this one area because I enjoy teaching this area. Please pass this rule to license in one area for middle school licensure.

Division Response

Comment considered. No change made.

COMMENT 4

Joseph Small, Little Rock School District, November 6, 2019

Comment:

It is my opinion that allowing middle school teachers to be licensed in only one subject would be beneficial to both teachers and students in Arkansas.

One reason is because some teachers excel in one particular subject while not in others because their interest is in that one subject. A teacher may have an interest in teaching Math and may be very educated and knowledgeable in Math but not in Science. They might be able to teach science but their desire is to teach Math. This is not the case with a primary school teacher who teaches all subjects to a younger age group, or high school teachers who are allowed to be licensed to teach only one subject if they want. If the Middle School teacher was able to be licensed in one subject area then they would be given the chance to teach what they are interested in teaching and focus on that subject. This brings me to my next reason.

Students would benefit from Middle School teachers being able to be licensed in one subject area because that teacher would be able to become an expert in that subject. Because of this students would be getting a great education from Middle School teachers who are excited and focused on that one subject area. I have seen first hand an English teacher who was switched by the principal to teach Social Studies and the struggle they had because even though they were licensed to teach social studies they had taught Language Arts for eight years and did not know the Social Studies content very well. That brings me to my last reason.

When a teacher is licensed in more than one subject area the principal of the school can move that teacher to teach a different subject that they are licensed to teach. If the teacher has a teaching license in more than one area because THEY chose to then this is not a problem because that teacher has a desire to teach more than one subject. However if a teacher wants to teach only Middle School Social Studies but they are forced to be licensed in another subject area just so they can teach Middle School Social Studies this puts the teacher in a vulnerable place where they could be moved to teach a subject that they are not knowledgeable in because they just needed another subject to get their standard teaching license for Middle School.

When students go to high school or college they get a teacher or professor who is proficient and knowledgeable in the one subject area that they teach. In a day when we place such high standards on education, why not give the middle school students this same educational experience? This is why it is my opinion that the requirements to attain a Middle School teaching license should be changed to require only one subject area.

Division Response

Comment considered: No change made.

COMMENT 5

Lucas Harder, Arkansas School Boards Association, October 28, 2019

Comments and Division Responses in Bold:

Educator Licensure:

1-2.08: With the transition from ADE to DESE, this definition is no longer in alphabetical order so I would recommend moving it to a new 1-2.22.

Comment Considered. Non-substantive change made

1-2.2223: The change from “Department” to “Division” puts this definition out of alphabetical order and so I would recommend moving it down to instead be 1-2.24.

Comment Considered. Non-substantive change made

1-2.2425: The comma between “cooperative” and “or” appears to have been turned into a “ç”.

Comment Considered. Non-substantive change made

1-2.3234: Due to the deletion of the old 1-2.31, this definition through 1-2.4348 are one number too high.

Comment Considered. Non-substantive change made

1-2.4449.1: This subsection through 1-2.4449.3 should be under 1-2.48 instead.

Comment Considered. Non-substantive change made

1-2.4550: Because of the increase at 1-2.4449.1- through 1-2.4449.3 instead of being at 1-2.4448.1 through 1-2.4448.3, this section through 1-2.5561 are all one higher than they should be.

Comment Considered. Non-substantive change made

2-1.01: “Department of Career Education” should be “Division of Career and Technical Education”.

Comment Considered. Non-substantive change made

3-1.03.1.2.3: The use of “EPP” here is confusing as it would appear to be “Educator Preparation Program” instead of “education program provider”.

Comment considered, no change made

3-1.03.1.5: The “and” at the end of this subsection should be moved to follow 3-1.03.1.6.

Comment Considered. Non-substantive change made

3-1.03.3: This should end in a colon instead of a semicolon.

Comment Considered. Non-substantive change made

3-1.03.4.1.1: I would recommend changing this to read “ A candidate in an alternative educator preparation program shall satisfy their clinical internship requirement by serving as a teacher of record at an education entity or accredited private school that ensures teachers participate in a Division approved novice teacher mentoring program.”

Comment Considered. Non-substantive change made

3-1.03.4.2: With the change indicated here, there are now two sections labeled 3.04.2 and I believe that this is supposed to be 3-1.03.4.1.2 instead.

Comment Considered. Non-substantive change made

3-1.05: I would recommend changing this to read “A preservice teacher shall complete all requirements for preservice teachers set forth in the Division Rules Governing Background Checks” so that the language more closely matches similar requirements for licensure applicants in the rules.

Comment Considered. Non-substantive change made

4-1.01.3: “Department of Career Education” should be “Division of Career and Technical Education”.

Comment Considered. Non-substantive change made

4-1.01.4.4: The “s” and “x” are flipped in “Dyslexia”.

Comment Considered. Non-substantive change made

4-2.01.7.3: The “and” at the end here should be moved to the end of 4-2.01.7.4.

Comment Considered. Non-substantive change made

4-3.01.9.1: To match all of the others, “involvement” should be “engagement”.

Comment Considered. Non-substantive change made

4-3.04: There is a very odd break in this section between “on” and “probation”.

Comment Considered. Non-substantive change made

4-6.01.5.4: There is a space missing from between “hour” and “of”.

Comment Considered. Non-substantive change made

4-10.6: In the note to this section, I would recommend changing it to read “or 7-12 English Language Arts , Mathematics, or Science” so that the order matches that in 4-10.6.1.

Comment Considered. Non-substantive change made

4-4-11.02.3.1: There is an extra “4-“ here.

Comment Considered. Non-substantive change made

I would recommend changing “for the Lead Professional Educator License” to “for the Lead Professional Educator Designation”.

Comment Considered. Non-substantive change made

4-11.02.3.1.1: I would recommend changing “for the Lead Professional Educator License” to “for the Lead Professional Educator Designation”.

Comment Considered. Non-substantive change made

4-11.02.3.3.1: I would recommend changing “for the Master Professional Educator License” to “for the Master Professional Educator Designation”.

Comment Considered. Did not see referenced section.

5-1.04: For clarity, I would recommend breaking this into two subsections so that it would read as follows:

5-1.04 The renewal of a license, including all endorsements, licensure content areas, and levels of licensure for the license, is effective:

5-1.04.1 For a currently valid license, the date the license is renewed through December 31 of the fifth year from the expiration date of the existing license; or

5-1.04.2 For licenses that have been expired for more than one (1) year, the date the old license was renewed through December 31 of the fifth year from the year of renewal.

Comment Considered. Non-substantive changes made to the prior four suggestions.

5-2.02.3.3: In the new language, there is both “Department” and “Division” when there should only be “Division”.

Comment Considered. Non-substantive change made

5-4.01.2: For grammatical purposes, I would recommend changing this to read “Five years have passed since the date the license was revoked if the revocation was for any reason other than those set forth in Section 5-4.01.1 of these Rules.

Comment Considered. Non-substantive change made

5-4.04.7.1: “Made against an individual” should be “made against the individual”.

I would recommend changing this to read “Any confidential information concerning student information regardless of the format of the information, which may include, but is not limited to, communications (physical and electronic); photographs (physical and electronic); audio or video recordings (analog and digital) shall be redacted and or edited to protect the identity of the person(s) that is currently or was a student at the time of the incident.”

Comment Considered. Non-substantive change made

5-4.05: There appears to be a missing “actions:” from the end of this section.

Comment Considered. Non-substantive change made

5-6.03: This section contains “Department Division” and should only have “Division”.

Comment Considered. Non-substantive change made

5-56.056: This section’s reference to 5-5.05 should be changed to 5-6.06 to match.

Comment Considered. Non-substantive change made

5-56.089: I believe that this should read “The Department Division shall not remove a licensure content area, or level of licensure, or designation once a license is issued, unless issued in error.”

Comment Considered. Non-substantive change made

6-2.01.2.4: The “Department of Career Education” should be changed to “Division of Career and Technical Education”.

Comment Considered. Non-substantive change made

6-2.01.2.5: To try and clarify that the licensure level on the old license is the trigger for needing to complete an internship, I would recommend changing this to read “An applicant with an older Building-Level Administrator license that is for less than all levels K-12 who is seeking to add a licensure level shall complete a current internship for the licensure levels missing from the existing license.”

Comment Considered. Non-substantive change made

6-2.01.2.6.1: There is an unnecessary space between the “0” and the “1” at the “20201”.

Comment Considered. Non-substantive change made

6-2.01.4.3.2: There is a “l” missing from between the “s” and “o” in “Division”.

Comment Considered. Non-substantive change made

6-3.01.3.1: There is an unnecessary space between the “0” and the “1” at the “20201”.

7-1.03: In accordance with Act 910, “Commissioner of Education” should be changed to “Commissioner of Elementary and Secondary Education”.

Comment Considered. Non-substantive change made

7-2.02.1: I would recommend adding language noting that the emergency teaching permit will end automatically if the individual employed under the permit becomes licensed in the area covered by the emergency teaching permit.

Comment Considered. Non-substantive change made

7-2.02.1.2: For clarity, I would recommend changing this to read “The school district’s application must demonstrate that the individual employed under the emergency teaching permit made progress in acquiring licensure for the area covered by the emergency teaching permit.”

Comment Considered. Non-substantive change made

7-4.05: There is a “to” missing from between “7-4.02.1” and “complete”.

Comment Considered. Non-substantive change made

7-7.01.1: “Quality” is on the wrong side of “Charter” here as it should read “Arkansas Quality Charter Schools Act”.

Comment Considered. Non-substantive change made

7-7.03: As “long term substitute” has not been previously abbreviated, I would recommend either adding a parenthetical “LTS” after it occurs at 7-6.05 or writing it out longhand here.

Comment Considered. Non-substantive change made

COMMENT 6

Megan Bates: Horace Mann Magnet School November 18, 2019

Comment:

I would love to attain a standard license in only one content middle school math. I love teaching middle school student math by using manipulatives, technology and other engaging techniques. Middle school is a time where students like to give up on a subject they might not understand. I want to uplift them and show them that math is not hard if we relate it to everyday situation.

Division Response

Comment considered: No change made

COMMENT 7

Joan Simon and Heather Christian Martens UCA

Comment:

I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As director of a state training program, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists.

The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

My suggested change:

In line with our National Association of School Psychologists, I am advocating that you change the criteria for state licensure above to:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

- a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences
- b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;
- c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

Division Response:

Comment considered: Added, “that includes 60 hours of graduate level coursework in the area, from an accredited state approved college or university” to clarify what is required. The universities in Arkansas that offer a School Psychology program are in line with the National Association of School Psychologists. Therefore, this addition will be in line with what those universities are requiring.

Comment considered: Non-substantive change made.

The Division does not offer licensure by age but rather by grade level. The Division may offer a (K-12) license. The Division does this with Speech Pathologists and Special Education and all other ancillary licenses. Ancillary licenses are allowed to serve Pre-k setting.

Comment Considered: No change made

COMMENT 8

Rebekah Cole Arkansas State November 19, 2019

Comment:

I am writing to express concerns regarding the allowance of emergency teaching permits to extend to school counselors as well. Without training in graduate school counseling coursework, school counselors cannot meet the social, emotional, and academic needs of students. They are unprepared to recognize and address serious mental health issues in students (such as suicide, self-harm, child abuse, etc.) and address these issues in an ethically and legally sound manner. Without an extensive education in ethical and legal issues, they put their school at school districts at risk of lawsuits.

While I do respect the need to place school counselors in schools, I would recommend that they be required to complete coursework through an ADE approved counselor education program as they work to complete a required master's degree in school counseling in a timely manner. This education and training will provide them with the knowledge and skills that they need to successfully perform their duties.

Division Response

By adding work experience as a requirement the only counselors that would be able to qualify for the ETP would be ones that have worked in an Act 1240 school or have worked as a counselor in another professional setting. The applicant would be able to complete an approved course of study in a year.

Comment considered. No change made.

COMMENT 9

Victoria Groves-Scott UCA, November 25, 2019

One revision that has a particular potential to lower the quality of education in Arkansas is new options for demonstrating subject matter content proficiency. In addition to the current approved content area exam(s) (i.e. Praxis and Pearson Foundation of Reading), the new rules add two more options. Does this mean that a person (outside of an EPP) would not have to take any exams to demonstrate subject matter content (including the Foundations of Reading test that EPPs work so hard to prepare teacher candidates for)? They would just teach a certain number of years to get a license? With the number of ACT 1240 waiver teachers and their concentration in schools serving primarily children who are poor and African American (and failing schools) this has the potential to further weaken the quality of education for those children who are already disadvantaged.

6.02 In order to be granted a license an applicant must demonstrate competency in their subject matter content on an identified assessment. An identified assessment may be:

6.02.1 An approved content area exam; or

6-02.2 A DESE approved micro-credential; or

6-02.3 Relevant teaching experience in the content area

Division Response

Clarified that an educator would have to complete four things in order to get a license absent an approved exam. Those four things being a score within minus two (-2) standard error of measurement (SEM) of the State approved score content area exam, a DESE approved stacked micro-credential, have three years of relevant teaching experience in their content area, and meet the definition of effective teacher under the rules. It would also have to be approved by State Board. Ark. Code Ann. § 6-15-1004(a)(1) allows the State Board to promulgate rules on which assessments to use and Ark. Code Ann. § 6-15-1004(a)(2) allows other methods when there is no assessment. This section allows the State Board to determine and accept what an identified assessment may be in certain circumstances.

Comment considered: Non-substantive change made.

COMMENT 10

Lauren McCoy, November 22, 2019

Comment:

I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences

b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;

c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Division Response:

See response to comment 7

COMMENT 11

Brooklin Jackson Bentonville School District, November 2019

Comment:

I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

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- a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences
- b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;
- c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Division Response

See response to comment 7

COMMENT 12

Charity Means-Burdess Rogers Public Schools, November 22, 2019

Comments:

I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education.

I serve as the Arkansas Delegate to the National Association of School Psychologists. If I can be of any assistance in aligning our state credentials with national standards, I willing and able to help.

As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences

b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;

c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Division Response

See response to Comment 7

COMMENT 13

Louis Nadelson, University of Central Arkansas, November 25, 2019

Comment: A revision that may lower the quality of education in Arkansas is new options for demonstrating subject matter content proficiency. In addition to the current approved content area exam(s) (i.e. Praxis and Pearson Foundation of Reading), the new rules add two more options.

Does this mean that a person (outside of an EPP) would not have to take any exams to demonstrate subject matter content (including the Foundations of Reading test that EPPs work so hard to prepare teacher candidates for)?

Would they just teach a certain number of years to get a license? With the number of ACT 1240 waiver teachers and their concentration in schools serving primarily children who are poor and African American (and failing schools) this has the potential to further weaken the quality of education for those children who are already disadvantaged.

6.02 In order to be granted a license an applicant must demonstrate competency in their subject matter content on an identified assessment. An identified assessment may be:

6.02.1 An approved content area exam; or

6-02.2 A DESE approved micro-credential; or

6-02.3 Relevant teaching experience in the content area

Thanks for addressing this critical issue of teacher effectiveness and preparation.

Division Response

See response to comment 9

COMMENT 14

Erin Shaw, University of Central Arkansas, November 26, 2019

I would like to make a public comment on the proposed revision to educator licensing. I have served for 24 years in Arkansas public schools- as a teacher and a school librarian. I am now a professor teaching future school librarians. I am concerned with the proposed revisions:

One revision that has a particular potential to impact higher education programs and the teaching profession is new options for demonstrating subject matter content proficiency. In addition to the current approved content area exam(s) (i.e. Praxis and Pearson Foundation of Reading), the new rules add two more options. This might mean that a person would not have to take any exams to demonstrate subject matter content expertise- instead they could just just teach a certain number of years. The text of the proposed revision is below.

6.02 In order to be granted a license an applicant must demonstrate competency in their subject matter content on an identified assessment. An identified assessment may be:

6.02.1 An approved content area exam; or

6-02.2 A DESE approved micro-credential; or

6-02.3 Relevant teaching experience in the content area

As a parent and fellow educator- I think this would be a big step backward to training and assessing qualified educators to help our Arkansas students succeed in the future.

Division Response

Clarified that an educator would have to complete four things in order to get a license absent an approved exam. Those four things being a score within minus two (-2) standard error of measurement (SEM) of the State approved score content area exam, a DESE approved stacked micro-credential, have three years of relevant teaching experience in their content area, and meet the definition of effective teacher under the rules. It would also have to be approved by State Board. Ark. Code Ann. § 6-15-1004(a)(1) allows the State Board to promulgate rules on which assessments to use and Ark. Code Ann. § 6-15-1004(a)(2) allows other methods when there is no assessment. This section allows the State Board to determine and accept what an identified assessment may be. In certain circumstances

Comment Considered: Non-substantive change made.

COMMENT 15

Sunny Styles-Foster, University of Central Arkansas, November 27, 2019

Comment: My concern is with the language under the Miscellaneous Provisions section, where multiple "assessments" are outlined to demonstrate competency in a content area. This is especially concerning, considering how hard EPPs have worked to align programs to the Science of Reading and the Foundations of Reading assessment.

Does this provision, specifically 6-.02.3, mean that all someone has to do is teach for a certain number of years in a content area and they will automatically be granted a license? Is this the same for those who are K-6 or Special Education? Will they not have to take the FoR assessment?

Considering the teacher turnover that exists, especially in schools that are in need of high quality teachers, this rule seems to water down the quality of teachers being produced in our state.

I hope the Department will consider how this will impact teacher knowledge and will work to ensure that ALL teachers are prepared to teach their content. Consider the fact that anyone who goes through an EPP will NOT be issued a license until they pass the appropriate Praxis Content assessment. The measurement tool should be consistent across the board and not left up to interpretation.

6.02 In order to be granted a license an applicant must demonstrate competency in their subject matter content on an identified assessment. An identified assessment may be:

6.02.1 An approved content area exam; or

6-02.2 A DESE approved micro-credential; or

6-02.3 Relevant teaching experience in the content area

Division Response

Clarified that an educator would have to complete four things in order to get a license absent an approved exam. Those four things being a score within minus two (-2) standard error of measurement (SEM) of the State approved score content area exam, a DESE approved stacked micro-credential, have three years of relevant teaching experience in their content area, and meet the definition of effective teacher under the rules. It would also have to be approved by State Board. Ark. Code Ann. § 6-15-1004(a)(1) allows the State Board to promulgate rules on which assessments to use and Ark. Code Ann. § 6-15-1004(a)(2) allows other methods when there is no assessment. This section allows the State Board to determine and accept what an identified assessment may be. In certain circumstances

Comment Considered: Non-substantive change made.

COMMENT 16

Clair Patton. Rogers Public School, December 2, 2019

Comment: I am writing in regards to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

- a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences
- b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;
- c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Division Response

See response to comment 7

COMMENT 17

Dr. Meagan Medley, Arkansas State University Comments made November 18, 2019, Public Comment Hearing. Dr. Medley also incorporated these comments into written comments which are responded to further down.

Comment: Throughout the document there is reference from a specific creditor rather than that accreditor dictating what happens within universities so it looks like there is accreditation language built in rather than the accreditation being a standalone thing so that particular creditor is CAPE, the Counsel for Accreditation for Educator Preparation and so once this specific area it looks like it's on page 18 it talks about the Education through Educator Provider Programs or Educator Preparation Programs (EPPs) those language specifically only that CAPE uses and then talks about the depth and breadth and those are kind of CAPE language things rather than if something were to happen to that other creditor or something with that relationship with the other accreditor it doesn't make sense for us to be using language from a specific business within our licensure rules.

Another is the language surrounding scientific reading instruction. On page 16, you'll see that it talks about scientific reading instruction something for Educator Preparation Programs but's unclear if it also means programs like school psychology graduate programs or if just for Teacher Preparation Programs. Is it just for grad or just for undergrad? There's some clarity that is missing there. Also the language about scientific reading instruction what exactly is that. Is that evidence based or is that research based because there is a differentiation between those two particular things.

The third would be teen suicide and prevention which is mentioned throughout for training purposes for all of our educators with licensure which is wonderful. I am absolutely in support of that. But due to Arkansas increased rate of suicide amongst teens it makes more sense for me to include that its children and adolescents rather than just teens. We are now 9th in the nation with our teen suicide rate. Our high school rate essentially, and that is increased from 14th as earlier so our rate keeps increasing and that's very high and concerning.

The fourth issue is specific to school psychology programs. School psychology licensure. The way it reads right now. There's two issues, one is that a master's degree is the standard when our national association of school psychologist's standard is the specialist's degree rather than a master's degree. Increasing that potentially grandfathered in folks that had master's degrees.

Fifth one is that school psychologist essentially function just like educators do where children that are in special education are eligible at age three in our school systems and so that means that there assessment comes at age two and nine months. And so with that particular situation the licensure and training actually does reflect what the licensure should reflect that pre-k rather than a K licensure. So right now it says K-12 under the licensure where it should say Pre-K or at least "even at age" to reflect the actual training and licensure needs that we have in the state because there no other educator assessor that can do that particular function for students with disabilities that start with us at age 3. Then on the cap end of that of age 21 also and those students are labeled as 12th graders. With the licensure currently saying K-12. It should read younger and older than that because students with disabilities can go through age 21 and may not necessarily be labeled by the school as 12th grader but they might be a 21 year old.

Written Comments from Dr. Meadley, December 3, 2019.

1. **Current:** Throughout there is language from a specific accreditation group (CAEP).
 - **Suggestion:** Eliminate language from a particular accreditor (currently CAEP)
 - **Comment:** Accreditation is for college/university. The concern is that a specific accreditor’s language is throughout the document. This language is to be adopted by college/university groups rather than state education groups. If something happens to the agreement between the state and accreditor and new partnerships are created, this is problematic. Selected phrasing from CAEP throughout includes:
 - i. Educator Preparation Program (EPP)
 - ii. 3-1.034 All EPPs shall work with partners

Comment Considered: Ancillary licensure programs do not require CAEP accreditation. No change made.

2. **Current document includes addition of:** 3-1.03.1.2 Scientific Reading Instruction
 - **Suggestion:** Evidence-based Reading Instruction with a clearer explanation of graduate vs undergraduate requirements and if those other areas of educator licensure like school psychology, school counseling, etc must fulfill this requirement.
 - **Comment:** An operational definition of what the reading instruction must include is needed. Additionally, there is a difference in scientific, research-based and evidence-based in any area. If this remains a requirement, evidence based is suggested as it includes that evidence must be present suggesting that the instruction works for whatever particular group/concern it targeted in research.

Comment considered: All licenses by May 2021 and thereafter are required to meet the awareness level.

3. **Current:** 4-9.01.6 An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master’s or higher degree, from an accredited college or university in....
 - **Suggestion:** “An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded ~~master’s~~ specialist or higher degree for degrees awarded from May 2020, from an accredited college or university in....”
 - **Comment:** The National Association of School psychologists maintains that the minimum acceptable education in school psychology is specialist-level training.
<https://www.nasponline.org/about-school-psychology/selecting-a-graduate-program/a-career-in-school-psychology-frequently-asked-questions>.

Comment considered: Added for clarity, “that includes 60 hours of graduate level coursework in the area, from an accredited state approved college or university” to clarify what is required. The universities in Arkansas that offer a School Psychology program are in line with the National Association of School Psychologists. Therefore, this addition will be in line with those universities are requiring.

Comment considered: Non-substantive change made.

4. **Current document includes additions within:** 7-2.02 upon submission by an education entity of the application required by the ~~Department~~ Division, the ~~Department~~ Division may issue an Emergency Teaching Permit to a non-licensed person hired to fill a teaching, school counseling, and library media vacancy under the following condition...

- **Suggestion #1** : 7-2.02 upon submission by an education entity of the application required by the ~~Department~~ Division, the ~~Department~~ Division may issue an Emergency Teaching Permit to a non-licensed person hired to fill a teaching, school counseling, school psychology, and library media vacancy under the following condition..." Add an additional line (7-2.02.5) for School Psychology that the individual applying for school psychology must be a current Nationally Certified School Psychologist. Without this qualifier, no addition of school psychology is endorsed.

Comment considered: No change made.

- **Comment #1:** Nationally Certified School Psychologists (by the National Association of School Psychologists) demonstrate their commitment to the highest levels of professionalism, ethical practices and continuing professional development in the field of school psychology. As only two programs in school psychology exist in the state of Arkansas, shortages do and will exist. This provides districts with the ability to attract a highly qualified out-of-state candidate. <https://www.nasponline.org/standards-and-certification/national-certification/why-become-an-ncsp>
- **Suggestion #2:** Those with emergency teaching permits in school counseling must have a supervisor with DESE licensure or national licensure and at least 1 hour a week of face-to-face (virtual or physical) supervision. Additionally, they must be enrolled in a college/university program that leads to the eligibility for DESE/ADE school counselor licensure.
- **Comment #2:** The critical and crucial areas that a school counselor may work could be life-threatening (mental health). This requires the utmost attention to these students' needs. Professional supervision can aid in ensuring that Arkansas students are served meeting the minimum basic standards of practice.

Comment considered: No change made

5. **Current:** 4-9.01.6 An applicant for an ancillary license in School Psychology shall ...
- **Suggestion:** Rephrasing this to align to/recognize the national standards put forth by the National Association of School Psychologists allowing for the Nationally Certified School Psychologist (NCSP) to submit that certification rather than documentation listed.
 - **Comment:** The NCSP credential is higher than what is required by ADE/DESE currently (Praxis II in School Psychology required, program must be NASP Approved or additionally steps required by the NCSP applicant). Currently 33 states recognize the NCSP for the school psychology credential. <https://www.nasponline.org/standards-and-certification/national-certification/why-become-an-ncsp>
 - *"The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:*
 - *A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences*
 - *At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;*
 - *The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.*

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination."

Comment Considered: See response to three.

6. **Current:** Chart on page 76, SCHOOL PSYCHOLOGY SPECIALIST (K-12).

- **Suggestion:** Change ~~K-12~~ to "birth-21" or "Pre-k – 21 years"
- **Comment:** Students suspected of having a disability are evaluated before their 3rd birthday as their eligibility with federal special education law IDEIA and DESE/ADE begins on their 3rd birthday. This means that school psychology specialists will be involved in these evaluations, consultation and referrals before kindergarten. Additionally, students with disabilities are eligible for special education through their 21st birthday. The ages need to reflect serving students throughout their educational opportunities in Arkansas.

Comment considered. The Division does not offer licensure by age but rather by grade level. The Division may offer a (K-12) license. The Division does this with Speech Pathologists and Special Education and all other ancillary licenses. Ancillary licenses are allowed to serve pre-k setting.

7. **Current:** 4-5.01.5.3 Two (2) hours of teen suicide awareness and prevention; and

- **Suggestion:** 4-5.01.5.3 Two (2) hours of ~~teen~~ child and adolescent suicide awareness and prevention; and
- **Comment:** The rising suicide rate for youth in the state of Arkansas as well as the extremely high rates of behaviors related to suicide as noted in the Youth Behavior Risk Survey by the CDC (2017 most recent data published). **See below for data synopsis comparing Arkansas to the US.**

Comment considered: Ark. Code Ann. 6-17-708 defines it as "Teen Suicide Awareness and Prevention". No change made

For the most recent data in 2017, Arkansas is statistically significantly higher in all suicide related areas asked to high school students on the CDC’s Youth Behavior Risk Survey compared other high school students across the United States.

- **Felt sad or hopeless:** almost every day for 2 weeks or more in a row so that they stopped doing some usual activities, during the 12 months before the survey
- **Seriously considered attempting suicide:** during the 12 months before the survey
- **Made a plan about how they would attempt suicide:** during the 12 months before the survey
- **Attempted suicide:** one or more times during the 12 months before the survey
- **Suicide attempt resulted in an injury, poisoning, or overdose that had to be treated by a doctor or nurse:** during the 12 months before the survey

Question	% Arkansas High School Students 2017	% United States High School Students 2017	p-value	Arkansas 2017 More Likely Than United States 2017	United States 2017 More Likely Than Arkansas 2017	No Difference
Felt sad or hopeless	40.2 (32.7–48.2)	31.5 (29.6–33.4)	0.02	Yes	No	No
Seriously considered attempting suicide	23.2 (21.0–25.5)	17.2 (16.2–18.3)	0.00	Yes	No	No
Made a plan about how they would attempt suicide	26.1 (16.9–38.0)	13.6 (12.4–14.8)	0.02	Yes	No	No
Attempted suicide	15.8 (13.3–18.7)	7.4 (6.5–8.4)	0.00	Yes	No	No
Suicide attempt resulted in an injury, poisoning, or overdose that had to be treated by a doctor or nurse	7.0 (5.1–9.5)	2.4 (2.1–2.9)	0.00	Yes	No	No

<https://nccd.cdc.gov/youthonline/App/Results.aspx?TT=G&OUT=0&SID=HS&QID=QQ&LID=AR&YID=2017&LID2=XX&YID2=2017&COL=&ROW1=&ROW2=&HT=QQ&LCT=&FS=S1&FR=R1&FG=G1&FSL=&FRL=&FGL=&PV=&C1=AR2017&C2=XX2017&QP=G&DP=1&VA=CI&CS=N&SYID=&EYID=&SC=DEFAULT&SO=ASC&pf=1&TST=True>

COMMENT 18

Audry Bowser, Arkansas State University, Public Comment Hearing November 18, 2019.

To clear up the rule about the requirements for PD of approved programs. I noticed that we added human trafficking awareness but I see that added to in state licensure but not for career technical permit, for out-of-state licensure, for alternative programs, and for ancillary. Why would we have it for in state EPP providers for student graduating but not for all the other areas who were seeking first time licensure?

Comment considered: Alternative prep programs do have to meet it under 3-1.03.1.7. Out-of-state licensures come in through reciprocity.

On pages 10 and 11 we've added some language on primary partnerships and secondary partnerships. All universities have to have partnerships for their EPP programs. There doesn't really seem to be a distinction between primary and secondary, and if there is how is it documented? What does that necessarily mean? Does it mean a new way to define our partnership with our clinical experiences?

Comment considered: No change made

Then on page 17, mention on the science of reading. Candidates licensing in all areas must have completed a prescribed pathway for awareness credential in order to be distinguished as an EPP completer. Does that mean just for undergraduate programs, initial licensure, and graduate program, what does that look like, how do you document that? I know we have to document that by July of next year. It's just not clear what that actually means.

Comment considered: All licenses by May 2021 and thereafter are required to meet the awareness level.

Then on page 20, a preservice student shall apply to identification bureau of the Department of the Arkansas State Police for a statewide and nationwide criminal records check. I understand that part. A preservice teacher is defined as a student enrolled in an EPP, an Educator Preparation Program. When should this occur, and I do understand that once the individual has a clear background check they can have it throughout the program but does this mean before a student ever becomes identified as a college of ed. student once they're admitted. Do they have so many months after they're admitted to their teacher ed program. Does it mean right before field experience. What does that truly, truly, mean for us and teacher ed. program?

Comment considered: It is up to the EPP to define when candidates are program enrollees. The background check is valid while the student is enrolled in the EPP. The applicant will need another background check when they start teaching if it has been over a year since their last background check.

There appears to be a difference in the rules about midlevel and I read it several times. For provisional license a Mid-level 4-8 participant that could be licensed in one area and now the rules have deleted that. It simply says a midlevel education participant may license in one or more of the four level licensure areas and one may have more than one endorsements at K-12 and 4-8. Does a midlevel licensure just indicate one area? Does it indicate one area plus k-12 or I just didn't have an understanding of that portion?

Comment Considered: A middle level license can be one area only but can add endorsements to the license.

COMMENT 19

Dr. Allison Freed, December 3, 2019

Comment: I have a question about the rules. I noticed that the Institutes of Higher Education must be accredited by a national organization like CAEP. Why don't the alternative licensure programs/pathways also have a similar national accreditation requirement? Why is the national accreditation an additional requirement for the IHE?

Division Response

Comment considered: The alternative programs are not degree granting institutions. Therefore, state approval is all that is required.

COMMENT 20

Dr. Amy Thompson, University of Central Arkansas, December 3, 2019

Comment: One revision that would have a detrimental impact on the quality of education in Arkansas is new options for demonstrating subject matter content proficiency. In addition to the current approved Praxis and Pearson Foundation of Reading exams, the new rules add two more, quite watered down options. Does this mean that a person (outside of an EPP) would not have to take any exams to demonstrate subject matter content (including the Foundations of Reading test that EPPs work so hard to prepare teacher candidates for)? An out from those exams would be a micro-credential or to just teach a certain number of years to get a license?

With the RISE initiative, dyslexia laws, and multi-million dollar grant ADE/DESE received to continue working towards providing an equitable education for students with dyslexia and to improve the abysmal literacy scores in our state, this is in direct conflict of what we are trying to accomplish. We have put in an incredible amount of work to revise our teacher education programs to prepare students for these exams only to give someone an out? We have made such progress in our state since laws began being implemented in 2014. We are nationally recognized for being so progressive and working to better our educator preparation and literacy rates which will positively impact the lives of Arkansans. This would be a gigantic step backwards. While some parents may be able to provide outside assistance for their children, a disservice and inequity would be felt across the disadvantaged, disenfranchised, and failing students and schools who are not so fortunate.

6.02 In order to be granted a license an applicant must demonstrate competency in their subject matter content on an identified assessment. An identified assessment may be:

6.02.1 An approved content area exam; or

6-02.2 A DESE approved micro-credential; or

6-02.3 Relevant teaching experience in the content area

Division Response

See response to comment 9

COMMENT 21

Cari Calhoun, Bentonville Schools, December 3, 2019

Comment: To whom it may concern:

I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

- a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences
- b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;
- c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Division Response

See response to comment 7

COMMENT 22

Carol Brown, Valley View Public Schools, December 3, 2019

I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure: The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

- a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences
- b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of

credit for the supervised specialist-level internship experience;

c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices.

The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Division Response

See response to comment 7

COMMENT 23

Dr. Debbie Dailey, University of Central Arkansas, December 3, 2019

Comment: Thank you for an opportunity to comment on the proposed DESE teacher licensure rules.

My main concern is in regards to 6-02.3 that would allow relevant teaching experience in a content area to be evidence of subject-matter competency. Classroom teaching experience is not a valid or reliable assessment to demonstrate competency....unless a teacher's competency can be assessed while teaching which would require multiple hours of observation and documentation using a valid and reliable observation scale.

Division Response

Added, “that includes 60 hours of graduate level coursework in the area, from an accredited state approved college or university” to clarify what is required. The universities in Arkansas that offer a School Psychology program are in line with the National Association of School Psychologists. Therefore, this addition will be in line with those universities are requiring.

Comment considered: Non-substantive change made.

The Division does not offer licensure by age but rather by grade level. The Division may offer a (K-12) license. The Division does this with Speech Pathologists and Special Education and all other ancillary licenses. Ancillary licenses are allowed to serve Pre-k setting.

Comment Considered: No change made

COMMENT 24

Elizabeth Sniff, Springdale Public Schools, December 3, 2019

Comment: I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master’s or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant’s successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

- a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences
- b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;
- c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Division Response

See response to comment 7

COMMENT 25

Jenna Sullivan, December 3, 2019

Comment: Hello. I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards

do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

- a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences
- b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;
- c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Division Response

See response to comment 7

COMMENT 26

Jennifer Jackson, Fayetteville Public School, December 3, 2019

Comment: I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

- a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences
- b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;
- c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Division Response

See response to comment 7

COMMENT 27

Jessica Herring, University of Central Arkansas, December 3, 2019

Comment: I have a concern that one such revision to teacher licensure has the potential to drastically lower the quality of teaching in Arkansas. Specifically, it would be problematic to include the option (6-02.3) that qualifies "[r]elevant teaching experience in the content area" as an identified assessment to demonstrate competency.

Those seeking teacher licensure already are no longer required to have 30 hours of their content area, and the only stopgap to ensure teachers getting a license in a content area now is the content area exam (for most, this is the Praxis assessment). Since there are no further qualifiers, the wording in these proposed rules leads one to believe any time spent in the classroom could constitute "relevant teaching experience in the content area." This could include substitute teachers or teachers on an Act 1240 waiver.

Those teaching on an Act 1240 waiver tend to teach in districts with high concentrations of students of color and in poverty, and many of these schools are classified as failing. Implementing 6-02.3 would create a backdoor for substitute teachers or teachers on an Act 1240 waiver to demonstrate competency without actually having to demonstrate competency.

In other words, this rule would allow someone with, say, a bachelor's degree in English, who has been assigned a social studies classroom under a 1240 waiver, to demonstrate competency in social studies content just by being the teacher of record. And just being the teacher of record does not mean the teacher will gain mastery of the content, nor does it indicate that the individual has gained any of the pedagogical training necessary in effective teaching and learning.

Further, there is no qualifier as to how much time in the classroom equates to "relevant teaching experience." Is this one semester, one year, three years?

I fear adoption of 6-02.3 will exacerbate the barriers students already face in getting high quality instruction. This, even more so for students from disadvantaged groups, like those in poverty and those in schools classified as failing.

A majority of teachers on an Act 1240 waiver are teaching in schools classified as D or F, and these schools have a combined average over 80% of low-income students and around 80% of the students in these schools are Black or Latinx.

Another concern is the potential to sidetrack the progress already made in implementing the science of reading in our schools. If 6-02.3 were implemented, would a licensure applicant be able to bypass the Foundations of Reading assessment by just teaching in an elementary classroom? Would this person, with no demonstrable proof of competency in the science of reading, be able to be deemed competent by simply having a job as a substitute or teacher of record on a 1240 waiver?

Thank you for your consideration of my public comment. Please contact me if you have any questions about my comment or would like further elaboration.

Division Response

See response to comment 9

COMMENT 28

Dr. Keith B. Lenz, University of Central Arkansas, December 3, 2019

Comment: I am commenting on the proposed changes related to the follow:

6.02 In order to be granted a license an applicant must demonstrate competency in their subject matter content on an identified assessment. An identified assessment may be:

6.02.1 An approved content area exam; or

6-02.2 A DESE approved micro-credential; or

6-02.3 Relevant teaching experience in the content area

Arkansas has recently made significant strides to address its low national ranking in literacy scores. In addition, it is finally beginning to address how to implement and improve adolescent literacy. As a national expert in the area of adolescent literacy, school-wide literacy centered school reform, and high-impact professional development, I am dismayed to see that "relevant teaching experience in the content area" would be considered a plausible substitute for current knowledge of evidenced-based literacy interventions and the challenge of placing literacy as a priority in our schools. A long history of the use of poor literacy practices is a huge barrier to the adoption of evidenced-based practices and the literacy leadership practices that guide implementation. I have worked side-by-side teachers and administrators who struggled to institute literacy-centered change in schools. These individuals were often thwarted at every turn by experienced teachers responsible for literacy instruction embedded in content courses or taught as separate intensive literacy courses. These teachers were unfamiliar with current literacy research or effective interventions. These teachers, rather than being open to learning about evidence-based practices perpetuated the use of poor practices that resulted to stagnant literacy scores. As we now approach the tasks associated with evidence-based literacy intervention in our content-centered middle and secondary schools, we must focus even harder on how secondary literacy interventionists and inclusion teachers weave literacy into their content areas and across the curriculum. The challenge will be to help experienced teachers learn how to embed literacy interventions into their content-area courses. This is hard work and allowing "teaching experience" as an option for licensure would be a crippling blow to the work that has been invested in Arkansas with the goal of making literacy important. Our bar must be higher! I have attached an article on how we can make literacy important and effective across grades 4 through 12. What we do to support our current corps of educators must pay off both in our current work as well as the plans that we make for the future. We also know that literacy improvement during the middle and high school years required different interventions than what is required in the

early years. To achieve sustainable change, the research says that more literacy-specific knowledge (i.e., through coursework and professional development) must be acquired by current teachers with the goal of teachers gaining fluency in well-executed evidence-based practices that can be implemented across both general and support class settings. Accepting "teaching experience" without evidence of mastery of knowledge of the science of reading and evidence-based practices implemented within an RTI framework across the K-12 grade continuum as an avenue for licensure contradicts everything we know about systemic change leading to permanently closing the gap between actual and expected achievement and is simply an embarrassing position to defend. Please increase the rigor of professional learning and development for the sake of the future of our students.

Division Response

See response to comment 9

COMMENT 29

Loretta Wallace, Fort Smith Schools, December 3, 2019

To whom it may concern:

I am writing regarding the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

- a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences
- b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;

c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Division Response

See response to comment 7

COMMENT 30

Michael Mills, University of Central Arkansas, December 3, 2019

Comment: I have a concern that one such revision to teacher licensure has the potential to drastically lower the quality of teaching in Arkansas. Specifically, it would be problematic to include the option (6-02.3) that qualifies "[r]elevant teaching experience in the content area" as an identified assessment to demonstrate competency.

Those seeking teacher licensure already are no longer required to have 30 hours of their content area, and the only stopgap to ensure teachers getting a license in a content area now is the content area exam (for most, this is the Praxis assessment). Since there are no further qualifiers, the wording in these proposed rules leads one to believe any time spent in the classroom could constitute "relevant teaching experience in the content area." This could include substitute teachers or teachers on an Act 1240 waiver.

Those teaching on an Act 1240 waiver tend to teach in districts with high concentrations of students of color and in poverty, and many of these schools are classified as failing. Implementing 6-02.3 would create a backdoor for substitute teachers or teachers on an Act 1240 waiver to demonstrate competency without actually having to demonstrate competency.

In other words, this rule would allow someone with, say, a bachelor's degree in English, who has been assigned a social studies classroom under a 1240 waiver, to demonstrate competency in social studies content just by being the teacher of record. And just being the teacher of record does not mean the teacher will gain mastery of the content.

Further, there is no qualifier as to how much time in the classroom equates to "relevant teaching experience." Is this one semester, one year, three years?

I fear adoption of 6-02.3 will exacerbate the barriers students already face in getting high quality instruction. This, even more so for students from disadvantaged groups, like those in poverty and those in schools classified as failing.

A majority of teachers on an Act 1240 waiver are teaching in schools classified as D or F, and these schools have a combined average over 80% of low-income students and around 80% of the students in these schools are Black or Latinx.

Another concern is the potential to sidetrack the progress already made in implementing the science of reading in our schools. If 6-02.3 were implemented, would a licensure applicant be able to bypass the Foundations of Reading assessment by just teaching in an elementary classroom? Would this person, with no demonstrable proof of competency in the science of reading, be able to be deemed competent by simply having a job as a substitute or teacher of record on a 1240 waiver?

Thank you for your consideration of my public comment. Please contact me if you have any questions about my comment or would like further elaboration.

Division Response

Added, "that includes 60 hours of graduate level coursework in the area, from an accredited state approved college or university" to clarify what is required. The universities in Arkansas that

offer a School Psychology program are in line with the National Association of School Psychologists. Therefore, this addition will be in line with those universities are requiring.

Comment considered: Non-substantive change made.

The Division does not offer licensure by age but rather by grade level. The Division may offer a (K-12) license. The Division does this with Speech Pathologists and Special Education and all other ancillary licenses. Ancillary licenses are allowed to serve Pre-k setting.

Comment Considered: No change made

COMMENT 31

Rebekah Hereth, Rogers Public Schools, December 3, 2019

I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

- a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences
- b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;

c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Division Response

See response to comment 7

COMMENT 32

Shoudong Feng, University of Central Arkansas, December 3, 2019

Comment: In regard to the following revisions, I have very strong feelings about 6-02.2 and 6-02.3.

There is ample research evidence, and most educators agree, teacher quality is the number one factor that determines teaching effectiveness. Teacher quality consists of many things, but content knowledge, classroom management skills, and dispositions should rank very high. While some teacher candidates may slip through the cracks in the teacher training system, it is hard to imagine putting teachers in classrooms without having them demonstrate content knowledge by taking and passing some content area tests. Again, while standardized exams may not give everyone a fair chance to demonstrate their knowledge, they are much more objective when compared with human evaluations that are ridden with bias, and certainly much better than having nothing at all.

Therefore, I am strongly opposed to adding the other two options (2 and 3) to state licensure requirements.

6.02 In order to be granted a license an applicant must demonstrate competency in their subject matter content on an identified assessment. An identified assessment may be:

6.02.1 An approved content area exam; or

6-02.2 A DESE approved micro-credential; or

6-02.3 Relevant teaching experience in the content area

Division Response

See response to comment 9

COMMENT 33

Elizabeth Spann, Conway Schools, December 3, 2019

I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences

b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;

c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Division Response

See response to comment 7

COMMENT 34

Tammy Hagood, December 3, 2019

Comment: I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

- a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences
- b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;
- c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

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School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Division Response

See response to comment 7

COMMENT 35

Caroline McLeod, Fayetteville Public Schools, December 4, 2019

Comment: Hello! I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

- a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences
- b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;
- c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Thank you for consideration of these issues,

Division Response

See response to comment 7

COMMENT 36

Krista Summers, Cave City School District, December 4, 2019

Comment: I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree from an accredited college or university, in:

4-9.01.6.1 School Psychology, (or)

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences

b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;

c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that under Levels and Areas of License, School Psychology Specialists are licensed to serve students K-12. However, special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

Division Response

See response to comment 7

COMMENT 37

Rita Phillips, December 3, 2019

I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences

b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;

c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

In addition, I have concerns about ADE continuing to offer an Educational Examiner license considering the program of study is minimum at best. School districts may use educational examiners to provide the services required under the Individuals with Disabilities Act thinking they are receiving services similar to that of a School Psychology Specialist. Given that the Educational Examiner program offered by the University of Arkansas is only 24 hours of study for a licensed teacher compared to the 60 hours of graduate study for School Psychology above the bachelor level, surely you understand my concern that students are at risk for poor quality evaluations the data from which are used to make educational decisions for our most at risk students.

Thank you for consideration of these issues,

Division Response

See response to comment 7

COMMENT 38

Tammy Hagood, December 3, 2019

I am writing in reference to the proposed changes to Educator Licensure currently being reviewed through the Arkansas Department of Education. As a School Psychology Specialist, I am concerned that the language in the current and proposed standards do not align with national standards for licensure of School Psychologists. The proposed language of 4-9.01.6 states:

An applicant for an ancillary license in School Psychology shall also submit an official transcript documenting an awarded master's or higher degree, from an accredited college or university, in:

4-9.01.6.1 School Psychology, or

4-9.01.6.2 Psychology and documenting the applicant's successful completion of a graduate-level, accredited School Psychology program.

The National Association of School Psychologists recommends the following criteria for state licensure:

The minimum requirement for credentialing as a school psychologist shall be a specialist-level program of study in school psychology (e.g., Ed.S., S.S.P., CAS, Psy.S., Masters 60 hrs.) consisting of the following:

- a. A minimum of 3 years of full-time study at the graduate level, or the equivalent inclusive of structured field experiences
- b. At least 60 graduate semester hours or the equivalent, with at least 54 hours exclusive of credit for the supervised specialist-level internship experience;
- c. The supervised internship experience must be taken for academic credit with a minimum of 1200 clock hours, including a minimum of 600 hours in a school setting and completed across one academic year on a full-time basis or two consecutive academic years on a half-time basis.

Applicants should achieve a passing score on a national exam specific to school psychology practices. The National School Psychology Certification Board has established a passing score on the Educational Testing Service's (ETS) School Psychology Examination.

Additionally, I am concerned that the under Levels and Areas of License School Psychology Specialists are licensed to serve students K-12 when special education services are provided for students age birth to 21. I recommend the following changes to the Levels and Areas of License to match the current services provided to students by School Psychology Specialists in the state of Arkansas:

School Psychology Specialist (birth to age 21)

OR

School Psychology Specialist (Pre-K to age 21)

Division Response

See response to comment 7

COMMENT 39

Taylor Ceyla, December 3, 2019

My comment is in reference to an item under the Miscellaneous Provisions in Chapter 5 of the pending rules for educator licensure.

p.56 5.60.02 under Miscellaneous Provisions:

"Relevant teaching experience in the content area" is not an assessment of content knowledge comparable to "approved content area exams." Current content exams approved by ADE in collaboration with others have been determined based upon state and national standard-setting studies using a variety of data. The content knowledge exams are used as an entry-level expectation along with other requirements into an initial licensure area or added endorsement. Those with experience can confirm their content knowledge by passing approved exams.

Division Response

See response to comment