



Virginia
Regulatory
Town Hall

Final Regulation Agency Background Document

Agency Name:	Virginia Department of Education
VAC Chapter Number:	8 VAC 20-541
Regulation Title:	8VAC20-540-10: Regulations Governing Approved Programs for Virginia Institutions of Higher Education
Action Title:	Final Submission of Regulations
Date:	April 4, 2001

Please refer to the Administrative Process Act (§ 9-6.14:9.1 *et seq.* of the *Code of Virginia*), Executive Order Twenty-Five (98), Executive Order Fifty-Eight (99) , and the *Virginia Register Form, Style and Procedure Manual* for more information and other materials required to be submitted in the final regulatory action package.

Summary

Please provide a brief summary of the new regulation, amendments to an existing regulation, or the regulation being repealed. There is no need to state each provision or amendment; instead give a summary of the regulatory action. If applicable, generally describe the existing regulation. Do not restate the regulation or the purpose and intent of the regulation in the summary. Rather, alert the reader to all substantive matters or changes contained in the proposed new regulation, amendments to an existing regulation, or the regulation being repealed. Please briefly and generally summarize any substantive changes made since the proposed action was published.

The regulations entitled, Virginia Approved Preparation Programs for Instructional Personnel, are repealed and replaced by the regulations entitled, Regulations Governing Approved Programs for Virginia Institutions of Higher Education.

Regulations contain standards for professional preparation programs for the framework of programs (Part I – Unit Standards) for the faculty (Part II – Faculty) for candidates (Part II) and accountability /resources.

A standard has been added to the regulations that states, “The professional education unit ensures that least 70% of candidates as documents in the institution’s declaration of admission to the teacher education program shall annually pass Praxis II (subject area assessments) for the

institution’s professional education unit to maintain Board of Education continued approved program status.

Standard 2: The professional education [~~department~~ unit] ensures that at least 70 percent of candidates as documented in the institution’s “declaration of admission” to the teacher education program shall annually pass Praxis II (subject area assessments) for the institution’s professional education [~~department~~ unit] to maintain Board of Education continued approved program status. Indicators of the achievement of this standard shall include, among other things, the following:

Official Educational Testing Service (ETS) score reports shall be maintained for at least five years for review during the accreditation review as part of the [~~institution's~~ professional education unit’s] documentation for continued approved program status[- ;]

Professional education units not meeting this requirement will receive provisional approval for a maximum of two years; failure to meet the 70 percent passing rate within the two-year period will result in the loss of Board of Education approved program status for the professional education department.

The professional unit must ensure that Virginia’s requirements of the Praxis I: Academic Skills Assessment and the Praxis II: Content Assessments must be satisfied prior to the completion of the approved program.

A definition of “Declaration of Admission” has been added to the regulations. The declaration of admission is the list of all candidates, both full- and part-time, who are fully admitted to an institution’s approved program and who have taken the Praxis II content assessments during the preceding academic year.

The initial publication of the proposed changes recommended a 24 semester hour professional studies cap for all undergraduate teacher preparation programs. This cap has since been changed to the following:

Professional studies course work and methodology, excluding field related experiences, shall be limited to 18 semester hours for any bachelor’s degree (or equivalent thereof). Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work and methodology excluding field experiences for any bachelor’s degree (or equivalent). A professional education unit may request and receive from the Board of Education a waiver to the above-mentioned 18-hour limitation after submitting documented rationale for such waiver. Such waiver shall not, under any circumstances, exceed 24 semester hours. However, the Board of Education may grant such waivers with any other terms and conditions, as the Board sees fit.

A written statement is required from the president of the institution certifying, on behalf of the institution, the following:

- (i) The institution supports fully its teacher preparation program and recognizes the important public mission of maintaining an effective teacher preparation program in the Commonwealth of Virginia;
- (ii) The institution acknowledges the responsibility for its candidates’ preparation and performance on the professional teachers’ examination prescribed by the Board of Education; and
- (iii) The institution will use its best efforts to ensure the success of its teacher preparation program.

Procedures for administering these regulations are defined in the publication entitled, “Manual for Administering the Regulations Governing Approved Programs for Virginia Institutions of Higher Education.” The Manual for Administering the Regulations Governing Approved Programs for Institutions of Higher Education contains the following components: (1) procedures for the review of specific endorsement programs; (2) procedures for the review of the professional education unit; (3) conditions for qualifying for the review of the professional education unit and specific endorsement programs; and (4) a template for professional education program on-site review. These procedures will result in recommendations to the Board of Education regarding the “approval,” “approval with stipulations,” or “denial” of accreditation.

Statement of Final Agency Action

Please provide a statement of the final action taken by the agency: including the date the action was taken, the name of the agency taking the action, and the title of the regulation.

The State Board of Education gave final approval to the Regulations Governing Approved Programs for Virginia Institutions of Higher Education at its regular meeting on February 15, 2001.

Basis

Please identify the state and/or federal source of legal authority to promulgate the regulation. The discussion of this statutory authority should: 1) describe its scope and the extent to which it is mandatory or discretionary; and 2) include a brief statement relating the content of the statutory authority to the specific regulation. In addition, where applicable, please describe the extent to which proposed changes exceed federal minimum requirements. Full citations of legal authority and, if available, web site addresses for locating the text of the cited authority, shall be provided. If the final text differs from that of the proposed, please state that the Office of the Attorney General has certified that the agency has the statutory authority to promulgate the final regulation and that it comports with applicable state and/or federal law.

Authority for the regulations is set forth in Sections 22.1-298, 22.1-305, and 22.1-316 of the Code of Virginia.

Code of Virginia, Section 22.1-298. **Regulations governing licensure state:** “The Board of Education shall, by regulation, prescribe the requirements for the licensure of teachers. Such regulations shall include a requirement that every teacher seeking initial licensure take a professional teacher’s assessment prescribed by the Board.”

Code of Virginia, Section 22.1-305.2. **Regulations governing the Advisory Board on Teacher Education and Licensure state:** “The Advisory Board on Teacher Education and Licensure shall advise the Board of Education and submit recommendations on policies applicable to the standards for the approval of preparation programs and reciprocal approval of preparation programs.”

Code of Virginia, Section 22.1-316. **Regulations governing the Interstate Agreement on Qualification of Educational Personnel state:** “The Interstate Agreement on Qualification of Educational Personnel is hereby enacted into law. Any contract dealing with acceptance of educational personnel on the basis of their having completed an educational program shall specify the earliest date or dates on which originating state approval of the program or programs involved can have occurred.”

Purpose

Please provide a statement explaining the need for the new or amended regulation. This statement must include the rationale or justification of the final regulatory action and detail the specific reasons it is essential to protect the health, safety or welfare of citizens. A statement of a general nature is not acceptable, particular rationales must be explicitly discussed. Please include a discussion of the goals of the proposal and the problems the proposal is intended to solve.

In 1995, the Board of Education adopted student Standards of Learning (SOL) in the core academic areas of mathematics, science, English, and social studies for students in kindergarten through grade twelve. In 1998, the Board adopted Virginia Licensure Regulations for School Personnel to ensure that school personnel have the background needed to facilitate student achievement of the standards. The licensure regulations established competencies for teacher preparation programs that are aligned with the SOL. To ensure that prospective teachers and other instructional personnel are provided the background necessary for quality instruction in the public schools and a level of quality in the professional education sequence that fosters competent practice, and the alignment between the SOL and the licensure competencies and programs, these regulations were revised. This revision of the standards is essential to the maintenance of our participation in the Interstate Agreement on Qualification of Education Personnel and to the establishment of a uniform, statewide licensure system for institutions of higher education.

Substance

Please identify and explain the new substantive provisions, the substantive changes to existing sections, or both where appropriate. Please note that a more detailed discussion is required under the statement of the regulatory action's detail.

The regulations entitled, Virginia Approved Preparation Programs for Instructional Personnel, are repealed and replaced by the regulations entitled, Regulations Governing Approved Programs for Virginia Institutions of Higher Education.

Regulations contain standards for professional preparation programs for the framework of programs (Part I – Unit Standards) for the faculty (Part II – Faculty) for candidates (Part II) and accountability /resources.

A standard has been added to the regulations that states, “The professional education unit ensures that least 70% of candidates as documents in the institution’s declaration of admission to the teacher education program shall annually pass Praxis II (subject area assessments) for the institution’s professional education unit to maintain Board of Education continued approved program status.

The professional unit must ensure that Virginia’s requirements of the Praxis I: Academic Skills Assessment and the Praxis II: Content Assessments must be satisfied prior to the completion of the approved program.

A definition of “Declaration of Admission” has been added to the regulations. The declaration of admission is the list of all candidates, both full- and part-time, who are fully admitted to an institution’s approved program and who have taken the Praxis II content assessments during the preceding academic year..

The initial publication of the proposed changes recommended a 24 semester hour professional studies cap for all undergraduate teacher preparation programs. This cap has since been changed to the following:

Professional studies course work and methodology, excluding field related experiences, shall be limited to 18 semester hours for any bachelor’s degree (or equivalent thereof). Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work and methodology excluding field experiences for any bachelor’s degree (or equivalent). A professional education unit may request and receive from the Board of Education a waiver to the above-mentioned 18-hour limitation after submitting documented rationale for such waiver. Such waiver shall not, under any circumstances, exceed 24 semester hours. However, the Board of Education may grant such waivers with any other terms and conditions, as the Board sees fit.

A written statement is required from the president of the institution certifying, on behalf of the institution, the following:

- (i) The institution supports fully its teacher preparation program and recognizes the important public mission of maintaining an effective teacher preparation program in the Commonwealth of Virginia;
- (ii) The institution acknowledges the responsibility for its candidates' preparation and performance on the professional teachers' examination prescribed by the Board of Education; and
- (iii) The institution will use its best efforts to ensure the success of its teacher preparation program.

Procedures for administering these regulations are defined in the publication entitled, "Manual for Administering the Regulations Governing Approved Programs for Virginia Institutions of Higher Education." The Manual for Administering the Regulations Governing Approved Programs for Institutions of Higher Education contains the following components: (1) procedures for the review of specific endorsement programs; (2) procedures for the review of the professional education unit; (3) conditions for qualifying for the review of the professional education unit and specific endorsement programs; and (4) a template for professional education program on-site review. These procedures will result in recommendations to the Board of Education regarding the "approval," "approval with stipulations," or "denial" of accreditation.

Issues

Please provide a statement identifying the issues associated with the final regulatory action. The term "issues" means: 1) the advantages and disadvantages to the public of implementing the new provisions; 2) the advantages and disadvantages to the agency or the Commonwealth; and 3) other pertinent matters of interest to the regulated community, government officials, and the public. If there are no disadvantages to the public or the Commonwealth, please include a sentence to that effect.

The approved program regulations do offer advantages to the Commonwealth. The licensure regulations for school personnel established competencies for teacher preparation programs that are aligned with the Standards of Learning. To ensure that prospective teachers and other instructional personnel are provided the background necessary for quality instruction in the public schools and a level of quality in the professional education sequence that fosters competent practice, and the alignment between the Standards of Learning and the licensure competencies and programs, these regulations were revised. This revision of the standards is essential to the maintenance of our participation in the Interstate Agreement on Qualification of Education Personnel and to the establishment of a uniform, statewide licensure system for institutions of higher education.

There are no disadvantages to the public or the Commonwealth in the implementation of the regulations.

Statement of Changes Made Since the Proposed Stage

Please highlight any changes, other than strictly editorial changes, made to the text of the proposed regulation since its publication.

- The definition of “declaration of admission” was revised to clarify the meaning of this term. The declaration of admission is the list of all candidates, both full- and part-time, who are fully admitted to an institution’s approved program and who have taken the Praxis II content assessments during the preceding academic year.
- For clarification, the term professional education “department” was changed to professional education “unit.” The term “unit” is clearer because the unit can mean the institution, college, school, department or other administrative body within the institution that is primarily responsible for the initial and advanced preparation of teachers and other professional school personnel.
- The requirement referring to the limit on professional studies course work, excluding field experiences, was revised. Originally, the regulation limited professional studies to 24 semester hours. The regulation was changed to limit professional studies to 18 semester hours. Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work and methodology. Language also was added to allow a professional education unit to request a waiver of the 18-hour limitation after submitting documented rationale for the waiver. The waiver, however, cannot exceed 24 semester hours.
- Language was added to the regulations to outline the sections of the Manual for Administering the Regulations Governing Approved Programs for Institutions of Higher Education. This manual is referenced in the regulations.
- Language was added to the regulations to require a written statement from the president of the institution the following:
 - (i) The institution supports fully its teacher preparation program and recognizes the important public mission of maintaining an effective teacher preparation program in the Commonwealth of Virginia;
 - (ii) The institution acknowledges the responsibility for its candidates’ preparation and performance on the professional teachers’ examination prescribed by the Board of Education; and
 - (iii) The institution will use its best efforts to ensure the success of its teacher preparation program.

Public Comment

Please summarize all public comment received during the public comment period and provide the agency response. If no public comment was received, please include a statement indicating that fact.

SUMMARY OF COMMENTS**PROPOSED REGULATIONS GOVERNING APPROVED PROGRAMS
FOR VIRGINIA INSTITUTIONS OF HIGHER EDUCATION**

Comment Received By: VACTE*and ATE-VA*
Legislative and Governmental Relations

Committee, Dr. Patricia Shoemaker
Amended Statement

*Virginia Association of the Colleges of Teacher Education

*Association of Teacher Educators in Virginia

Date Comment Received: October 25, 2000

Summary of Comment:

Both organizations advocate a comprehensive, statewide system for ensuring teacher quality. Although the proposed regulations represent one aspect of a comprehensive quality assurance program (approved teacher preparation in institutions of higher education), there are other quality assurance issues not addressed. The preparation of teachers who come from outside of Virginia and the provisional licenses that are now available for up to six years for individuals who have not passed the Praxis assessments or do not meet other basic requirements are undermining teacher preparation programs.

Primary concerns are as follows:

1. The procedures for the Review of the Specific Endorsement Programs include processes that are duplicative, time-consuming, and costly. The proposed regulations require that each competency must have documented experiences, indicators, and evidence. Most experiences and evidence will relate to more than one competency. There is no plan for how the review of the competencies will be used to improve programs.

Recommendation: The Board of Education, the Department of Education, and colleges and universities work together to integrate data needs for program review, including the development of a web-based system.

Accept the Folio reviews by the learned societies for NCATE-approved institutions.

- 2. The use of the term “professional education department” does not reflect the locus of responsibility at the institutional level.
- 3. The lack of appropriate provisions in the standards for ensuring the competency of candidates in teaching all children.

RESPONSE TO COMMENT

The regulations address approved programs in four-year colleges and universities in Virginia. The regulations allow for the modification of approved programs for prospective teachers with life experiences, career achievements, academic backgrounds, related practice, and others who wish to enter the teaching profession.

Requirements governing alternative routes to licensure are set forth in the Licensure Regulations for School Personnel. Concern for the level of accountability to which alternate routes to licensure are held may be expressed as those regulations complete the Administrative Process Act (APA) procedures.

The term “professional education department” has been changed to “unit.”

The sub-competencies identified in the procedures for the review of specific endorsement areas are guidelines based on the licensure competencies. Review procedures will be based on evidence of the achievement of the competencies.

Comment Received By: Dr. Chuck Watson, Director
School of Education
James Madison University

Date Comment Received: October 19, 2000 and November 22, 2000

Summary of Comment:

All (teacher education institutions, accrediting agencies, boards of education, and staff members) are committed to a central, moral purpose --improving the lives of children. A shift from reviewing program inputs to reviewing outcomes will allow teacher preparation programs to be more effectively monitored and managed. How preservice teachers perform in terms of children’s achievement must be more closely examined by the institutions where they are

prepared to teach. We support the proposed standards but would like to make the following recommendations:

Recommendations:

Combined State/NCATE teams should not have to review two types of reports. For NCATE-accredited institutions, the Institutional Report and documentation should be accepted for the state’s requirements.

If the above is not acceptable, we recommend that a set of cross-referenced matrices be developed that address each of the two agency’s standards, with the reports submitted in a web-based format and linked in such a manner that each of the two sets of data and institutional reports would provide information for both.

We support the idea that team members use professional judgement and expertise to ascertain the degree to which a teacher education unit meets a standard, but we do not feel it is appropriate for team members to make recommendations regarding overall approval or denial. The places an enormous strain on the professional and collegial relationships that we currently enjoy.

We are also concerned that the quality assurance measures required by the approved program standards and procedures will not apply to the thousands of teachers who are being hired from outside of Virginia, nor will they be likely to help us address the looming teacher shortages.

RESPONSE TO COMMENT

Currently, Virginia and NCATE have a state partnership. The State/NCATE partnership must be renegotiated next year, and procedures associated with the partnership will be reviewed at that time.

The decision with regard to approval, approval with stipulations, or denial applies to the professional education unit and the final decision regarding program approval is clearly the authority of the Virginia Board of Education, not the authority of the on-site team.

Requirements governing alternative routes to licensure are set forth in the Licensure Regulations for School Personnel. Concern for the level of accountability to which alternate routes to licensure are held may be expressed as those regulations complete the Administrative Process Act (APA) procedures.

Comment Received By: Dr. Patricia P. Kelly
Director of Teacher Education
Virginia Tech

Date Comment Received: October 19, 2000

Summary of Comment:

The proposed regulations will require that two separate documents be prepared for institutions to complete the state review process and the NCATE accreditation process. This will be an expensive, costly, and very time-consuming effort to provide essentially the same information in different formats.

Recommendation: Allow the NCATE documentation to be recognized for the state review process.

RESPONSE TO COMMENT

Currently, Virginia and NCATE have a state partnership. The State/NCATE partnership must be renegotiated next year, and procedures associated with the partnership will be reviewed at that time.

Comment Received By: Dr. Leslie Willett
Director of Teacher Education
Hollins University

Date Comment Received: October 16, 2000

Summary of Comment:

Hollins University supports maintaining the 24-hour cap for teacher licensure programs. The Career Switcher Alternate Route to licensure should be as rigorous as the programs for others who are seeking initial licensure.

RESPONSE TO COMMENT

The initial publication of the proposed changes recommended a 24 semester hour professional studies cap for all undergraduate teacher preparation programs. This cap has since been changed to the following:

Professional studies course work and methodology, excluding field related experiences, shall be limited to 18 semester hours for any bachelor’s degree (or equivalent thereof). Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work and methodology excluding field experiences for any bachelor’s degree (or equivalent). A professional education unit may request and receive from the Board of Education a waiver to the above-mentioned 18-hour limitation after submitting documented rationale for such waiver. Such waiver shall not, under any circumstances, exceed 24 semester hours. However, the Board of Education may grant such waivers with any other terms and conditions, as the Board sees fit.

Requirements governing alternative routes to licensure are set forth in the Licensure Regulations for School Personnel. Concern for the level of accountability to which alternate routes to licensure are held may be expressed as those regulations complete the Administrative Process Act (APA) procedures.

Comment Received By: Gerald Clay, Chair
Division of Education
Bluefield College

Date Comment Received: October 16, 2000

Summary of Comment:

Bluefield College supports the 24-hour cap for teacher preparation programs. The options to licensure such as the career switcher program for military personnel, the issuance of provisional licenses to individuals who do not meet minimum requirements, and the issuance of the local superintendents license create a double standard for preparing teachers in Virginia and compromise teacher quality and the ability of students to meet the Standards of Learning.

RESPONSE TO COMMENT

The initial publication of the proposed changes recommended a 24 semester hour professional studies cap for all undergraduate teacher preparation programs. This cap has since been changed to the following:

Professional studies course work and methodology, excluding field related experiences, shall be limited to 18 semester hours for any bachelor’s degree (or equivalent thereof). Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work and methodology excluding field experiences for any bachelor’s degree (or equivalent). A professional education unit may request and receive from the Board of Education a waiver to the above-mentioned 18-hour limitation after submitting documented rationale for such waiver. Such waiver shall not, under any circumstances, exceed 24 semester hours. However, the Board of Education may grant such waivers with any other terms and conditions, as the Board sees fit.

Requirements governing alternative routes to licensure are set forth in the Licensure Regulations for School Personnel. Concern for the level of accountability to which alternate routes to licensure are held may be expressed as those regulations complete the Administrative Process Act (APA) procedures.

Comment Received By: Dr. John S. Oehler, Dean
School of Education
Virginia Commonwealth University

Date Comment Received: October 17, 2000

Summary of Comment:

The School of Education and the University are concerned about Standards 1 and 2 in Part IV: Operation and Accountability of Professional Education Programs and the implementation procedures outlined in the Procedures Manual.

Standards 1 and 2 are not clear as to whether the professional education department (unit) or the institution is granted approved program status. Standards 1 and 2 refer specifically to the professional education department (or unit) while one of the indicators of Standard 2 refers to the institution.

Recommendation: Clarify that institutions are responsible for teacher education as well as professional education units.

The regulations lack clarity about an institutional commitment to support teacher preparation as a college or university function. Neither Education departments nor their faculty teach the content courses necessary to pass Praxis I and Praxis II content tests.

Recommendation: Include as an indicator of achievement of Standard 2, the requirement that there be a written agreement that the professional education department has institutional authority to leverage the expectation that teacher preparation candidates are well-prepared to meet Praxis I and II requirements. This requirement of a written agreement should also be referenced in the Conditions for Qualifying.

Clear language is lacking for individual program reviews. The current national professional specialty association's folio reviews and the proposed competency-based system in the procedures manual will result in mounds of paper rather than a clear assessment.

Recommendation: Invest additional time and expertise in refining the implementation of program review strategies so that the result is reliable and valid evidence of performance.

COMMENT REPOSE

Currently, Virginia and NCATE have a state partnership. The State/NCATE partnership must be renegotiated next year, and procedures associated with the partnership will be reviewed at that time.

A written statement is required from the president of the institution certifying, on behalf of the institution, the following:

- (i) The institution supports fully its teacher preparation program and recognizes the important public mission of maintaining an effective teacher preparation program in the Commonwealth of Virginia;
- (ii) The institution acknowledges the responsibility for its candidates' preparation and performance on the professional teachers' examination prescribed by the Board of Education; and
- (iii) The institution will use its best efforts to ensure the success of its teacher preparation program.

Comment Received By: Dr. Leslie Lambert, Chair
 Department of Education and Physical Education
 Roanoke College

Date Comment Received: October 17, 2000

Summary of Comment:

Roanoke College supports maintaining the 24-hour cap to accommodate the new licensure requirements in instructional technology and content area reading. In addition, the use of routes to licensure, developed as a result of the predicted teacher shortage, are of concern. Roanoke College students are reporting that they will not enter a teacher preparation program at the collegiate level because they can get a teaching job without it.

COMMENT RESPONSE

The initial publication of the proposed changes recommended a 24 semester hour professional studies cap for all undergraduate teacher preparation programs. This cap has since been changed to the following:

Professional studies course work and methodology, excluding field related experiences, shall be limited to 18 semester hours for any bachelor's degree (or equivalent thereof). Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work and methodology excluding field experiences for any bachelor's degree (or equivalent). A professional education unit may request and receive from the Board of Education a waiver to the above-mentioned 18-hour limitation after submitting documented rationale for such waiver. Such waiver shall not, under any circumstances, exceed 24 semester hours. However, the Board of Education may grant such waivers with any other terms and conditions, as the Board sees fit.

Requirements governing alternative routes to licensure are set forth in the Licensure Regulations for School Personnel. Concern for the level of accountability to which alternate routes to

licensure are held may be expressed as those regulations complete the Administrative Process Act (APA) procedures.

Comment Received By: Dr. Brenda Gilman
Department of Education
Randolph-Macon College

Date Comment Received: October 18, 2000

Summary of Comment:

Randolph-Macon opposes lowering the professional studies cap from 24 semester hours. Students there are provided extraordinary learning experiences in reading and technology which would be eliminated if the cap is reduced. Concern about the alternative routes to licensure that will entice students to avoid teacher preparation programs was also expressed.

COMMENT RESPONSE

The initial publication of the proposed changes recommended a 24 semester hour professional studies cap for all undergraduate teacher preparation programs. This cap has since been changed to the following:

Professional studies course work and methodology, excluding field related experiences, shall be limited to 18 semester hours for any bachelor’s degree (or equivalent thereof). Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work and methodology excluding field experiences for any bachelor’s degree (or equivalent). A professional education unit may request and receive from the Board of Education a waiver to the above-mentioned 18-hour limitation after submitting documented rationale for such waiver. Such waiver shall not, under any circumstances, exceed 24 semester hours. However, the Board of Education may grant such waivers with any other terms and conditions, as the Board sees fit.

Requirements governing alternative routes to licensure are set forth in the Licensure Regulations for School Personnel. Concern for the level of accountability to which alternate routes to licensure are held may be expressed as those regulations complete the Administrative Process Act (APA) procedures.

Comment Received By: Dr. Sandra Cohen, Director
Teacher Education Program
Curry School, University of Virginia

Date Comment Received: October 18, 2000

Summary of Comment:

The proposed approved program review process is burdensome and redundant. The review of endorsement areas should be completed in a more contextual manner. Teaching should be reviewed as an integrative act rather than broken into minute parts. The creation of a documents room requires months of preparation and organization. Removal of pertinent primary documents from the context in which they are naturally stored reduces their impact as part of the program.

Recommendation: Conduct an open discussion of other forms of accreditation that can provide options and also assure the Board of Education that state standards are met. Such a program is the emerging TEAC review. More discussion should follow the public comment on the program approval process.

COMMENT RESPONSE

With the implementation of the revised standards and procedures, every opportunity will be utilized to report electronically as another measure to streamline and reduce the volume of paperwork associated with the accreditation review process.

Comment Received By: Dr. David Breneman, Dean

Curry School
University of Virginia

Date Comment Received: October 18, 2000

Summary of Comment:

The Curry School of Education supports the expansion of the professional studies cap to 24 semester hours. Additional avenues may be opened for teacher recruitment. However, standards that are at least as rigorous as those applied to the 37 approved teacher preparation programs within the Commonwealth must be maintained for all avenues. If the Board of Education is not vigilant in this area, a two-tier system will develop that will discourage individuals from completing teacher education programs.

COMMENT RESPONSE

The initial publication of the proposed changes recommended a 24 semester hour professional studies cap for all undergraduate teacher preparation programs. This cap has since been changed to the following:

Professional studies course work and methodology, excluding field related experiences, shall be limited to 18 semester hours for any bachelor’s degree (or equivalent thereof). Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work and methodology excluding field experiences for any bachelor’s degree (or equivalent). A professional education unit may request and receive from the Board of Education a waiver to the above-mentioned 18-hour limitation after submitting documented rationale for such waiver. Such waiver shall not, under any circumstances, exceed 24 semester hours. However, the Board of Education may grant such waivers with any other terms and conditions, as the Board sees fit.

Requirements governing alternative routes to licensure are set forth in the Licensure Regulations for School Personnel. Concern for the level of accountability to which alternate routes to licensure are held may be expressed as those regulations complete the Administrative Process Act (APA) procedures.

Comment Received By: Mary Ramseyer
UVA’s College at Wise

Date Comment Received: October 18, 2000

Summary of Comment:

We support 24 hours of professional studies to accommodate the addition of content area reading and technology. We also support a comprehensive approach to addressing the teacher shortage that does not create a double standard for teacher preparation.

COMMENT RESPONSE

The initial publication of the proposed changes recommended a 24 semester hour professional studies cap for all undergraduate teacher preparation programs. This cap has since been changed to the following:

Professional studies course work and methodology, excluding field related experiences, shall be limited to 18 semester hours for any bachelor’s degree (or equivalent thereof). Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work

and methodology excluding field experiences for any bachelor’s degree (or equivalent). A professional education unit may request and receive from the Board of Education a waiver to the above-mentioned 18-hour limitation after submitting documented rationale for such waiver. Such waiver shall not, under any circumstances, exceed 24 semester hours. However, the Board of Education may grant such waivers with any other terms and conditions, as the Board sees fit.

Comment Received By: Dr. Edgar H. Thompson
Neff Education Center
Emory and Henry College

Date Comment Received: October 17, 2000

Summary of Comment:

Emory and Henry supports the 24 hour allocation for professional studies. All paths to teacher licensure should be guided by a consistent plan that maintains appropriate preparation procedures, standards, and accountability.

Recommendation: Allow a composite score for Praxis I.

COMMENT RESPONSE

The initial publication of the proposed changes recommended a 24 semester hour professional studies cap for all undergraduate teacher preparation programs. This cap has since been changed to the following:

Professional studies course work and methodology, excluding field related experiences, shall be limited to 18 semester hours for any bachelor’s degree (or equivalent thereof). Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work and methodology excluding field experiences for any bachelor’s degree (or equivalent). A professional education unit may request and receive from the Board of Education a waiver to the above-mentioned 18-hour limitation after submitting documented rationale for such waiver. Such waiver shall not, under any circumstances, exceed 24 semester hours. However, the Board of Education may grant such waivers with any other terms and conditions, as the Board sees fit.

The Board of Education is reviewing an alternative for the Praxis I assessment.

Comment Received By: Donna H. Watson, Adjunct Faculty

Bluefield College

Date Comment Received: October 17, 2000

Summary of Comment:

This is another statement of support for 24 hours of professional studies and concern over the lack of a comprehensive program for teacher preparation, support, development, and accountability. Licensure options have created a double standard.

Comment Received By: Dr. Carole Grove, Director
Master of Arts in Teaching Program
Mary Baldwin College

Date Comment Received: October 17, 2000

Summary of Comment:

We strongly support the 24-hour professional studies allowance.

Comment Received By: Dr. Mary Bowser, Chair

Education Division
Shenandoah University

Date Comment Received: October 18, 2000

We have two areas of concern: reducing the 24-hour professional studies allowance and the quality of teachers in the classroom. What is the purpose of having approved programs with high standards if students see an easier, less rigorous route to become teachers. In the end, the students are the victims.

Comment Received By: Dr. H. Jurgen Combs
Education Division
Shenandoah University

Date Comment Received: October 18, 2000

Summary of Comment:

Maintain the 24 hour professional studies requirement for everyone regardless of the route to licensure. Potential teachers should not have the option to choose between an easy or a difficult route.

Comment Received By: Paula Johnson, Coordinator of Field Relations

Graduate School of Education
George Mason University

Date Comment Received: October 19, 2000

Summary of Comment:

Keep the 24 hour professional studies allowance. Develop a comprehensive approach to the teacher shortage problem that maintains quality and accountability for all routes to licensure.

COMMENT RESPONSE

The initial publication of the proposed changes recommended a 24 semester hour professional studies cap for all undergraduate teacher preparation programs. This cap has since been changed to the following:

Professional studies course work and methodology, excluding field related experiences, shall be limited to 18 semester hours for any bachelor’s degree (or equivalent thereof). Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work and methodology excluding field experiences for any bachelor’s degree (or equivalent). A professional education unit may request and receive from the Board of Education a waiver to the above-mentioned 18-hour limitation after submitting documented rationale for such waiver. Such waiver shall not, under any circumstances, exceed 24 semester hours. However, the Board of Education may grant such waivers with any other terms and conditions, as the Board sees fit.

Comment Received By: Dr. Martin E. Ford, Acting Dean
Graduate School of Education
George Mason University

Date Comment Received: October 19, 2000

Summary of Comment:

The new military career switcher program denigrates the work done recently to comply with the licensure competencies. Expedience, not quality, will be the guiding principle for candidates seeking training. The quantity of teachers may temporarily go up, but their overall quality will go down. The GMU Graduate School of Education has developed new initiatives to help provisionally licensed teachers meet high standards for teacher preparation with respect to reading, technology, diversity, content preparation, and supervised fieldwork. While this form of on-the-job training is not ideal, it is better than allowing candidates to be fully licensed with substandard preparation.

COMMENT RESPONSE

Requirements governing alternative routes to licensure are set forth in the Licensure Regulations for School Personnel. Concern for the level of accountability to which alternate routes to licensure are held may be expressed as those regulations complete the Administrative Process Act (APA) procedures.

Comment Received By: Dr. Alan A. Arroyo, Dean
School of Education
Regent University

Date Comment Received: November 3, 2000

Summary of Comment:

Regent University is concerned that the proposed regulations do not combine the best of peer review with a focus on performance outcomes. Specifically, the NCATE-like proposed regulations are cumbersome and may harm teacher preparation programs in Virginia. Private enterprise can recruit more individuals into fast-paced programs with fewer (or no) regulations and less overhead. The form and substance of the program review process will diminish resources that we would rather keep in the program. If the intent is to have all institutions approved by a national teacher accrediting organization, we request to choose one that focuses on outcomes and institutional commitment.

COMMENT RESPONSE

Currently, Virginia and NCATE have a state partnership. The State/NCATE partnership must be renegotiated next year, and procedures associated with the partnership will be reviewed at that time. With the implementation of the revised standards and procedures, every opportunity will be utilized to report electronically as another measure to streamline and reduce the volume of paperwork associated with the accreditation review process.

Comment Received By: Anne Pingstock
School of Education and Human Development
Lynchburg College

Date Comment Received: November 17, 2000

Summary of Comment:

Keep the 24 hour professional studies allowance. Define more clearly the “Declaration of Admission.” Clarify the expectation for when the Praxis II assessment would be taken. The quality assurance for approved programs is very different from alternative routes to licensure.

Recommendations: The cap on professional studies should be maintained at 24 semester hours. Clarify admission in the Declaration of Admission.

Apply approved program regulations to all agencies that prepare teachers.

Permit each teacher preparation program to develop a data collection system appropriate to its program.

Allow institutions to develop non competency-specific assessment plans that reflect the complex nature of teaching.

COMMENT RESPONSE

The initial publication of the proposed changes recommended a 24 semester hour professional studies cap for all undergraduate teacher preparation programs. This cap has since been changed to the following:

Professional studies course work and methodology, excluding field related experiences, shall be limited to 18 semester hours for any bachelor’s degree (or equivalent thereof). Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work and methodology excluding field experiences for any bachelor’s degree (or equivalent). A professional education unit may request and receive from the Board of Education a waiver to the above-mentioned 18-hour limitation after submitting documented rationale for such waiver. Such waiver shall not, under any circumstances, exceed 24 semester hours. However, the Board of Education may grant such waivers with any other terms and conditions, as the Board sees fit.

The Declaration of Admission has been redefined as recommended. The Declaration of Admission does not stipulate when the student must take the Praxis II content assessment nor does it stipulate when the student is fully admitted to the program.

The regulations allow institutions to develop data collection systems that are appropriate to programs and non competency-specific assessment plans.

Comment Received By: Dr. Judy Engelhard, Chairperson

Special Education Department
Radford University

Date Comment Received: November 21, 2000

Summary of Comment:

Please consider a degree in special education an “academic major.” The critical shortage of special education teachers has resulted in a high percentage of teachers being hired in special education positions who are not prepared to assume responsibility for students assigned to them. Allowing a degree in special education at the undergraduate level may reduce the enormity of this problem and assist in the retention of quality teachers. Special education has a well-defined body of knowledge that is research-based. Content in this field reflects specialized knowledge of disabilities in the areas of characteristics, etiology, medical influences, as well as knowledge and skill in providing specialized intervention and remedial strategies including adapting instruction for students to achieve Virginia’s Standards of Learning.

Recommendation: Change Part II. Standard 3:1 to read as follows: *Completion of institutional requirements for academic degrees in the arts and sciences except in special education, health, physical, and vocational education for baccalaureate candidates.*

Recommendation: Delete *24 semester hours* from Part II. Standard 4:1. Quality and accountability are determined by the presence of elements not by placing a limit on them. The cap of 24 hours is arbitrary and fails to consider national accreditation requirements and the desire of some programs to provide dual licensure options for students.

Recommendation: Change the title of the regulations document to *Regulations Governing Approved Programs in Virginia* and apply the same degree of rigor and accountability to other options for licensing teachers. Higher education institutions should have the same flexibility afforded other licensing programs.

Recommendation: Study the efficacy of the Praxis exams. Some students miss the score requirements by one or two points and graduate without being allowed to student teach. These students are often hired on a provisional license in Virginia or leave Virginia to teach in a neighboring state. Students are incredulous that being hired is easier than completing the teacher preparation program.

COMMENT RESPONSE

The only education degrees approved are in vocational education and health and physical education. Special education programs must require a degree in the arts and sciences; however, the Board of Education did increase the professional studies hours allowed in a special education program to 24 semester hours.

The initial publication of the proposed changes recommended a 24 semester hour professional studies cap for all undergraduate teacher preparation programs. This cap has since been changed to the following:

Professional studies course work and methodology, excluding field related experiences, shall be limited to 18 semester hours for any bachelor's degree (or equivalent thereof). Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work and methodology excluding field experiences for any bachelor's degree (or equivalent). A professional education unit may request and receive from the Board of Education a waiver to the above-mentioned 18-hour limitation after submitting documented rationale for such waiver. Such waiver shall not, under any circumstances, exceed 24 semester hours. However, the Board of Education may grant such waivers with any other terms and conditions, as the Board sees fit.

The Board of Education is reviewing a proposed alternative to the Praxis I assessment.

Comment Received By: Dr. John Gilje, Dean
College of Education and Psychology
James Madison University

Date Comment Received: November 21, 2000

Summary of Comment:

JMU faculty expressed concern related to NCATE accredited institutions, the lack of alignment between the proposed standards and procedures and NCATE 2000. The type of documentation required by the Virginia standards will be treated by NCATE as background data. This has major implications for how the NCATE-accredited institutions would document their efforts to address both sets of standards.

Recommendations: Allow NCATE institutions to submit folios to NCATE-recognized specialty professional associations in lieu of undergoing state program endorsement review and follow the state review process in other endorsement areas.

Develop a web-based, single report format that will allow NCATE institutional reports to link directly to documents that respond to state standards in lieu of preparing two separate reports.

Accept NCATE's review of the teacher education unit based on the performance-based NCATE 2000 standards.

Require NCATE institutions to address the approved program standards unique to Virginia, both in a separate section of the NCATE institutional report and during the on-site review.

Develop a new NCATE-Virginia partnership agreement that will address issues of redundant reporting, on-site review procedures, etc.

Comment: Keep the 24-hour professional studies cap for all programs. The Board of Education raised the cap to accommodate recent legislative changes mandating additional preparation in content area reading and instructional technology. Because those requirements were mandated for all endorsement areas, it is inappropriate to raise the cap for selected programs.

Comment: For the foreseeable future, at least half of the teachers in Virginia (40% from outside of Virginia, up to 10% on the local license, and those who have the provisional license) will be prepared through programs that do not meet the more stringent regulations proposed for Virginia colleges and universities.

Recommendation: Virginia programs that prepare teachers through other avenues should also be required to meet standards similar to the approved program regulations.

Comment: JMU believes that on-site review teams should judge whether an institution has presented enough evidence to consider a standard met or not met. However, the role of the on-site review team is not to make an overall recommendation for the approval, approval with stipulations, or denial of a teacher education program. That decision belongs to the Advisory Board on Teacher Education and Licensure and the Board of Education.

Recommendation: On-site review teams should not make any recommendations regarding program approval. The Advisory Board on Teacher Education and Licensure should review all pertinent documents and reports and develop a recommendation regarding program approval with the final decision to be made by the Board of Education.

Comment: A term other than Professional Education Department should be used when referring to the administrative body that is primarily responsible for teacher preparation in an institution. "Department" is easily confused with an already existing organizational structure. As defined in the proposed regulations, the professional education department goes beyond traditional organizational structures to encompass all teacher preparation programs within the institution, no matter where they are housed

Recommendation: If Unit is not acceptable, use a more encompassing word than "Department."

Comment: The Declaration of Admission is confusing and needs clear definition.

Recommendation: The Declaration of Admission should be redefined as a list of all candidates, both full- and part-time, who are fully admitted to an institution's approved program and who have taken the Praxis II content assessments during the preceding academic year.

Comment: The terms "professional education faculty," "school faculty," and references to higher education faculty need to be clarified.

Recommendation: Eliminate the general term “faculty.” Define Higher Education Faculty in the definitions section, and make appropriate changes in the “faculty” category of the regulations.

COMMENT RESPONSE

The Declaration of Admission was redefined.

The professional education department is not referred to as the unit.

With the implementation of the revised standards and procedures, every opportunity will be utilized to report electronically as another measure to streamline and reduce the volume of paperwork associated with the accreditation review process.

The Board of Education has the authority to grant final approval of teacher preparation programs, not the on-site review team.

Requirements governing alternative routes to licensure are set forth in the Licensure Regulations for School Personnel. Concern for the level of accountability to which alternate routes to licensure are held may be expressed as those regulations complete the Administrative Process Act (APA) procedures.

The initial publication of the proposed changes recommended a 24 semester hour professional studies cap for all undergraduate teacher preparation programs. This cap has since been changed to the following:

Professional studies course work and methodology, excluding field related experiences, shall be limited to 18 semester hours for any bachelor’s degree (or equivalent thereof). Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work and methodology excluding field experiences for any bachelor’s degree (or equivalent). A professional education unit may request and receive from the Board of Education a waiver to the above-mentioned 18-hour limitation after submitting documented rationale for such waiver. Such waiver shall not, under any circumstances, exceed 24 semester hours. However, the Board of Education may grant such waivers with any other terms and conditions, as the Board sees fit.

Comment Received By: Dr. Virginia McLaughlin, Dean
School of Education
The College of William and Mary

Date Comment Received: November 27, 2000

Summary of Comment:

Documentation requirements for review of specific endorsement programs have been embellished and go well beyond the standards themselves. The stakeholder groups, who participated in the design of templates that were intended to be guides for review of endorsement programs, have elaborated substantially on the standards by specifying sub-competencies for each area. Institutions should NOT be required to document all of these sub-items which have never been reviewed and approved as actual standards.

The amount of documentation required will be unmanageable for institutions to prepare and for teams to review adequately.

The lack of alignment of the State Program Approval Process with the NCATE requirements is disappointing. Completing and submitting dual sets of program folios will create an impossible burden for professional education units. The process for science education, for example, would require a total of eight different, highly elaborate notebooks with boxes of supporting documentation for a program that produces about five students per year. We have one science educator on our faculty. As Dean, I would think carefully whether we can afford the resources for this level of documentation to continue an approved program in science education.

This is particularly disconcerting when alternate route programs are not required to submit similar documentation but are approved simply on the basis of Praxis scores in the endorsement areas. Something is wrong when the approved program process is becoming so overwhelming that it may drive high quality programs out of business at a time when we need them most.

Recommendation: The Board of Education, ABTEL, and VDOE staff re-examine the proposed program approval process to make it more manageable for all concerned. Pursue partnership with NCATE to streamline the processes for those institutions that choose to be nationally accredited.

COMMENT RESPONSE

Currently, Virginia and NCATE have a state partnership. The State/NCATE partnership must be renegotiated next year, and procedures associated with the partnership will be reviewed at that time.

With the implementation of the revised standards and procedures, every opportunity will be utilized to report electronically as another measure to streamline and reduce the volume of paperwork associated with the accreditation review process.

Comment Received By: Face Project
Daniel Price

Date Comment Received: October 29, 2000

Summary of Comment:

The Face Project believes that teachers need training to teach Character Education recently mandated for all public schools in Virginia. “There should be a required Character Education Course as part of a Teacher’s Licensure.” The letter included recommended objectives for a course.

Recommendation: A character education course should be taught by institutions of higher education and required for teacher licensure.

COMMENT RESPONSE

The Board of Education has established limit of 18 semester hours for professional studies, excluding field experiences, in undergraduate teacher preparation programs. With the limited number of professional studies courses allowed, a separate course in character education is not required.

Detail of Changes

Please detail any changes, other than strictly editorial changes, that are being proposed. Please detail new substantive provisions, all substantive changes to existing sections, or both where appropriate. This statement should provide a section-by-section description - or crosswalk - of changes implemented by the proposed regulatory action. Include citations to the specific sections of an existing regulation being amended and explain the consequences of the changes.

A standard has been added to the regulations that states, “The professional education unit ensures that least 70% of candidates as documents in the institution’s declaration of admission to the teacher education program shall annually pass Praxis II (subject area assessments) for the institution’s professional education unit to maintain Board of Education continued approved program status.

The professional unit must ensure that Virginia’s requirements of the Praxis I: Academic Skills Assessment and the Praxis II: Content Assessments must be satisfied prior to the completion of the approved program.

A definition of “Declaration of Admission” has been added to the regulations. The declaration of admission is the list of all candidates, both full- and part-time, who are fully admitted to an

institution's approved program and who have taken the Praxis II content assessments during the preceding academic year..

The initial publication of the proposed changes recommended a 24 semester hour professional studies cap for all undergraduate teacher preparation programs. This cap has since been changed to the following:

Professional studies course work and methodology, excluding field related experiences, shall be limited to 18 semester hours for any bachelor's degree (or equivalent thereof). Programs in elementary education (PreK-3 and PreK-6) and special education shall not exceed 24 semester hours of professional course work and methodology excluding field experiences for any bachelor's degree (or equivalent). A professional education unit may request and receive from the Board of Education a waiver to the above-mentioned 18-hour limitation after submitting documented rationale for such waiver. Such waiver shall not, under any circumstances, exceed 24 semester hours. However, the Board of Education may grant such waivers with any other terms and conditions, as the Board sees fit.

A written statement is required from the president of the institution certifying, on behalf of the institution, the following:

- (iii) The institution supports fully its teacher preparation program and recognizes the important public mission of maintaining an effective teacher preparation program in the Commonwealth of Virginia;
- (iv) The institution acknowledges the responsibility for its candidates' preparation and performance on the professional teachers' examination prescribed by the Board of Education; and
- (iii) The institution will use its best efforts to ensure the success of its teacher preparation program.

Procedures for administering these regulations are defined in the publication entitled, "Manual for Administering the Regulations Governing Approved Programs for Virginia Institutions of Higher Education." ~~[Compliance with these standards will determine the accreditation of Virginia's approved teacher preparation programs.]~~ The Manual for Administering the Regulations Governing Approved Programs for Institutions of Higher Education contains the following components: (1) procedures for the review of specific endorsement programs; (2) procedures for the review of the professional education unit; (3) conditions for qualifying for the review of the professional education unit and specific endorsement programs; and (4) a template for professional education program on-site review. These procedures will result in recommendations to the Board of Education regarding the "approval," "approval with stipulations," or "denial" of accreditation.

Family Impact Statement

Please provide an analysis of the regulatory action that assesses the impact on the institution of the family and family stability including the extent to which the regulatory action will: 1) strengthen or erode

the authority and rights of parents in the education, nurturing, and supervision of their children; 2) encourage or discourage economic self-sufficiency, self-pride, and the assumption of responsibility for oneself, one's spouse, and one's children and/or elderly parents; 3) strengthen or erode the marital commitment; and 4) increase or decrease disposable family income.

The Regulations Governing Approved Programs in Virginia Institutions of Higher Education will have no impact on the family and family stability.