



**Jones, Stephanie**

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**From:** Mark Despotakis <markd@pmea.net>  
**Sent:** Thursday, January 7, 2021 1:48 PM  
**To:** ED, State Board of Ed  
**Subject:** [External] Certification of Professional Personnel (Proposed Regulation 6-346)

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I am writing in response to the Certification of Professional Personnel (Proposed Regulation 6-346). The addition of education in professional ethics, structured literacy, and CR-SE in teacher preparation programs is valid and a necessary component for students preparing for a career in education.

It is important for the State Board to take into consideration 1) the space necessary to include these areas into already full higher ed degree programs and 2) the financial cost associated to higher ed institutions in adding these areas. That is not to say these areas of study should not be included. Rather the regulations should note the additional burdens placed on institutions.

Instruction in these areas should not be just an add on but rather done with intention and purpose so students will receive the true benefit of training. Important to note is that educator preparation programs are limited in credits they can offer, so adding space for these areas of study (as separate courses or built-in to current courses) may present problems depending on specifics at each institution. It will be valuable to provide guidance to teacher preparation programs about the content of these areas to make sure they are not glossed over. Specific standards or clearer parameters than just *teaching about* these things is necessary because the manner and content could look different from one institution or class to another. Making space to teach these areas in already packed preservice educator programs will need to be accounted for as well.

To add education in professional ethics, structured literacy, and CR-SE – higher education instructors will need to be trained to teach relevant content. That training will come at an additional cost. Professional development and adjustments to teaching time are areas where additional financial costs may be incurred by higher ed institutions as well. The proposed regulation notes the additional expenses local education agencies may incur in other parts of the proposal. Realizing and including the additional expenses to higher ed institutions for the educator preparation area should also be noted.

It will be important to make sure higher ed institutions are appropriately provided training and the financial support necessary to include these areas in their educator preparation programs.

Respectfully submitted,

Mark Despotakis  
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