

**OFFICE OF CHIEF ACCOUNTABILITY OFFICER**  
**Summary of State Board of Education Agenda Item**  
**Consent Agenda**  
**April 19, 2023**

**DIVISION OF EDUCATOR PREPARATION**

- M. Approval to revise Miss. Admin. Code Title 7: Part 107: 2021 Educator Preparation Provider Process and Performance Guidelines, to amend certain criteria.  
(Has cleared the Administrative Procedures Act process with public comments)

Background Information: In accordance with Miss. Code Ann. § 37-3-2(1) there is established within the MDE the Commission on Teacher and Administrator Education, Certification and Licensure and Development. It shall be the purpose and duty of the Commission to make recommendations to the Mississippi Board of Education regarding standards for the certification and licensure and continuing professional development of those who teach or perform tasks of an educational nature in the public schools of Mississippi.

The Division of Educator Preparation requested the following revisions and/or updates to the 2021 Educator Preparation Provider Process and Performance Guidelines.

- Revisions Section III, Standards and Ethics.
  - State Review Processes, Annual Report, require the submission of data on all common state-wide assessments.
  - EPP Program Review Directions, require the submission of recruitment plans or sunseting plans for low enrollment programs.
  
- Revisions and updates to Section VI, Curriculum, Content Knowledge Tests, Candidate Admittance Requirements, and Candidate Exit Requirements.
  - Requirement for literacy course syllabi alignment to the International Dyslexia Association's 2018 Knowledge and Practice Standards (KPS) for Teachers of Reading and the International Literacy Association's Standards (ILA), 2017. To be effective January 1, 2024.
  - Define Literacy I, Literacy II, and Reading Pedagogy in secondary programs as Structured Literacy aligned to IDA and ILA. To be effective January 1, 2024.
  - Change Elementary program requirement from two (2) 18-hour concentrations to one (1) 18-hour content concentration and one 12-hour reading endorsement to align with requirements in K-6 MAT. Effective upon State Board of Education approval.

Public comments were received from February 21, 2023 through March 22, 2023. Six (6) comments were submitted from one (1) EPP. Based on the public comments received, no substantial changes are recommended by the MDE.

Recommendation: Approval

Back-up material attached

## State Review Processes (page 19)

The Mississippi State Board of Education (SBE) maintains a partnership the Council for the Accreditation for Educator Preparation (CAEP). The [CAEP Partnership Agreement](#) aligns with the state's review of licensure programs. Through the partnership agreement, EPPs have the option to further demonstrate program quality by voluntarily pursuing national recognition through the Specialized Professional Association (SPA); however, ultimately, the MDE maintains sole authority for program review and approval.

### Annual Report

Each institution of higher education with a teacher education program approved by the State Board of Education shall prepare and submit to the State Board of Education and to the Board of Trustees of State Institutions of Higher Learning (IHL) an annual performance report on the institution's teacher education program. (Miss. Code Ann. §37-101-29)

The EPP annual report shall be submitted electronically to the MDE on or before March 31. The annual report submission shall align with CAEP and Title II annual reports. The annual report submitted by EPPs shall include all required elements needed to meet the requirements of Miss. Code Ann. §37-101-29 which includes but is not limited to:

- performance and demographic data on admitted candidates and completers, including individual GPAs and cohort GPAs for each academic year: fall, spring, summer;
- data on professional education faculty qualifications and participation in ongoing professional learning in collaboration with MDE state supported initiatives; and
- number of program completers scoring at or above the proficiency level (passing score) on the state licensure test *reported by number of attempts*. (Praxis II exams, Foundations of Reading Test, and School Leaders Licensure Assessment);
- statewide common assessment scores for all applicable programs.
- 

### Student Teacher Placement Report

Each IHE with a teacher education program approved by the SBE shall prepare and submit to the MDE a semester report on student teaching.

The EPP semester report shall be submitted electronically to the MDE on or before November 1 for fall teacher candidates and April 1 for spring teacher candidates. The semester report submitted by EPPs shall include:

- candidate placement information on number completing student teaching, completing one and two placements, completing only face-to-face placements, completing only virtual placements, completing hybrid placements, completing within each school district;
- seminar/professional disposition topics conducted by the EPP;
- teacher candidate information to include name, email, and licensure area;

- cooperating teacher information to include name, email, employing school/grades, licensure area, common assessment training date, number of years teaching, and/or NBCT; and university supervisor information to include name, email, common assessment training date, number of years in K-12, highest degree held, and number of candidates supervised.

## EPP Program Review Directions **(page 25)**

Each program submitting a review shall provide three years of data on candidates beginning with the current academic year. This shall include candidates admitted into the program, candidates enrolled in the program, and candidates who completed the program. Enrolled number should **include admitted and completed**. Report the data separately if offered at multiple sites. Create additional tables as necessary.

<b>Name of Program: ex. Elementary Education</b>			
<b>Campus: ex. Main Campus</b>			
Academic Year	# Candidates Enrolled	# Candidates Admitted	# Candidates Completed

*Data Source: MDE Annual Report*

Please provide the following contextual information:

- Summarize programmatic improvements and/or changes made over the past three years and cite specific examples of data used to make the decisions.
- Share two or three future program goals and cite specific examples of data that will be used to make these decisions. How will these goals impact P-12 learning outcomes for Mississippi?
- Any additional relevant information about the program.
- Recruitment and/or sunseting plans for low enrollment and critical subject shortage programs.

Each program will provide evidence for meeting each standard in the space below the element. If program has submitted a SPA report, answer only 1.1. Include documentation of report in Program of Study folder (see pages 107-109) which will replace elements 1.2 through 1.7.

**For programs completing reviews at the Initial Level:** Each program will complete only Standard 1 (with the exception of the program that is submitting for SPA review). Standards 2 and 3 will be answered at the EPP level as one report. Program reviews completed at the Advanced Level (Administration, School Counseling, etc.) will complete all three standards.

- *Mississippi Educator Professional Growth System (PGS)*
- *Mississippi Educator Code of Ethics*

**(Page 27)**

*Upload artifacts separately in Program of Study folder.*

### Content Knowledge

- 1.2 Candidates are prepared with the critical concepts, principles, and practices aligned to applicable state and national standards that ensure preparation for the recommended licensure area.

Narrative highlights how the program prepares candidates with the critical concepts, principles, and practices to ensure preparation for recommended licensure. Supporting evidence shall include Content Knowledge, PLT, and Foundations of Reading (if applicable) test results. Evidence includes the last 3 years of licensure exam pass rates of completers as reported in the MDE Annual Report. Provide a brief analysis of data findings and interpretation of data (limitations, steps for improvement, etc.). Indicate which course(s) prepare for the test and when in the program the candidates are suggested to take the test. Include data charts using the following conventions for reporting data (create a new chart for each campus):

**ex. PLT Data**

<b>Program:</b> ex. Elementary Education								
<b>Campus:</b> ex. Main campus								
<b>Test and Test Code:</b> ex. PLT K-6 (5622)								
Academic Year	# Tested	Qualifying Score	National Mean	State Mean	EPP Mean	EPP Range	% Passing	% Passing 1 <sup>st</sup> Attempt
ex. 2020-21	N=64	160	175.13	173.03	174.41	151-193	95%	89%
ex. 2019-20	N=80		175.25	172.49	174.76	160-193	100%	90%
ex. 2018-19	N=60		175.23	173.00	176.58	161-193	100%	85%

<b>Program:</b> ex. Elementary Education						
<b>Campus:</b> ex. Main campus						
<b>Test and Test Code:</b> ex. PLT K-6 (5622) Sub-scores						
Academic Year	# Tested	Category	Max Pts Available Range	National % Correct	State % Correct	EPP % Correct
ex. 2020-21	N=64	I. Students as Learners	21	72.31	67.69	72.11
		II. Instructional Process	21	74.03	71.67	77.10
		III. Assessment	13-14	71.21	71.32	76.17
		IV. Prof Dev Lead & Comm	13-14	82.22	76.96	80.72
		V. Analysis of Instr Scenarios	16	72.94	70.79	74.11

**Instruction: Pedagogical Skills**

- 1.3 Candidates experience multiple opportunities to learn core content and lesson planning using high-quality instructional materials aligned to standards and can apply skills in diverse P-12 settings.

The narrative highlights opportunities to learn and practice a variety of instructional methods in accordance with the Mississippi College and Career Standards (MSCRRS): sequence of lessons; concepts, strategies, and skills; constructive feedback, motivation, and student engagement; whole/small group instruction; and instruction that enhances each student’s learning. Supporting evidence shall include 3 cycles of data from TIAI indicators 1-5 and 9-19 (final summative by US) with the following: brief analysis of data findings and how data was used to improve the

## Curriculum (Page 60)

All educator preparation programs shall be appropriately accredited by the national accrediting body approved by the SBE and shall meet all Mississippi Department of Education standards to ensure program graduates are prepared with the skills and knowledge necessary for licensure with the Mississippi Department of Education.

Traditional teacher licensure candidates shall satisfactorily complete required coursework that shall include instruction in three 3-hour courses:

1. Classroom Management (CM) (per Miss. Code Ann. § 37-3-89),
2. Special Education (SPED), and
3. Data Analysis/Evaluation (DAE).

Consistent with MS- IHL Policy 512, licensure core curriculum requirements for all programs consist of the following:

English Composition	6 semester hours
College Algebra, Quantitative Reasoning, or higher-level mathematics	3 semester hours
Natural Science	6 semester hours
Humanities and Fine Arts	9 semester hours
Social or Behavioral Science	6 semester hours

### ~~Literacy-based Promotion Act (Miss. Code Ann § 37-177-1) and Mississippi's Comprehensive Literacy Plan~~

#### Science of Reading and Structured Literacy Standards Alignment

~~To ensure licensure programs prepare candidates with the skills and knowledge to impact P-12 student learning outcomes in literacy, Special Education, and Child Development/Early Childhood~~

To ensure licensure candidates are prepared with the skills and knowledge to effectively deliver literacy instruction grounded in the Science of Reading and Structured Literacy Practices as required in Miss. Codes Ann. § 37-177-1 and § 37-173-16 for professional educators, all literacy coursework in programs leading to licensure shall be aligned to the International Dyslexia Association's 2018 Knowledge and Practice Standards for Teachers of Reading and the International Literacy Association's Standards, 2017. ~~licensure programs shall include a course or courses on research-based reading instruction to include the areas of phonemic awareness, phonics, fluency, vocabulary and comprehension.~~

~~Elementary Education programs shall include two courses, Literacy I and Literacy II Educational Leadership programs shall ensure candidates have the skills and knowledge to support teachers' instructional practice in explicit, systematic, and sequential approaches to teaching phonemic awareness, phonics, vocabulary, fluency, and comprehension.~~

## Elementary Education Program of Study (Page 61)

Interdisciplinary programs of study for elementary education teacher candidates shall include:

English	12 semester hours
Mathematics	9 semester hours
Science	9 semester hours
Social Studies	12 semester hours
Fine Arts/Teaching of Fine Arts	3 semester hours
Reading/Literacy	12 semester hours
*Shall include Literacy I or <u>Structured Literacy I</u> , Literacy II or <u>Structured Literacy II</u> , Integrating Reading and Writing Across the Curriculum, and Diagnosing and Assessing Reading Difficulties	
Special Education	3 semester hours
Classroom Management	3 semester hours
Data Analysis/Evaluation	3 semester hours

Elementary Education teacher candidates seeking licensure in K-6 shall complete ~~two~~ **one 18-hour content area concentration and one twelve (12) hour reading endorsement.**

### Secondary Subject Area Licensure Programs (7-12)

In addition to an academic major in the subject area, or equivalent hours, candidates seeking licensure in grades 7-12 shall complete the following:

English Composition	6 semester hours
College Algebra, Quantitative Reasoning, or higher-level mathematics	3 semester hours
Natural Science	6 semester hours
Humanities and Fine Arts	9 semester hours
Special Education	3 semester hours
Classroom Management	3 semester hours
Data Analysis/Evaluation	3 semester hours
Reading Pedagogy/ <u>Structured Literacy</u>	3 semester hours

Summary of Comment	MDE Response
<p><b>The University of Southern Mississippi in reference to the overall process for the requested changes to the EPP Guidelines.</b></p> <p><i>“Any comments related to the EPP Process and Performance Guidelines must begin with the interpretation of Miss. Code Ann. §37-101-29. The Code section provides for the inclusion of data referenced in seven unique bullets:</i></p> <ul style="list-style-type: none"> <li><i>a) Teacher enrollment data;</i></li> <li><i>b) Professional education faculty data;</i></li> <li><i>c) Characteristics of students receiving initial licensure;</i></li> <li><i>d) Number and percentage of program completers scoring at or above the proficiency level on the prescribed teacher education exit tests;</i></li> <li><i>e) Satisfaction rate of employers and graduates;</i></li> <li><i>f) Follow-up profiles of graduates of the teacher education program; and</i></li> <li><i>g) Any other information required by the State Board of Education.</i></li> </ul> <p><i>Bullet (g) goes on to say, “Before requiring any other information, the State Board of Education shall conduct collaborative planning activities with the Mississippi Association of Colleges of Teacher Education and the Board of Trustees of State Institutions of Higher Learning.</i></p> <p><i>We can assert with great certainty that such collaborative planning activities have occurred sparingly or not at all prior to any of the most recent changes to EPP Process and Performance Guidelines. A singular or Mississippi Department of Education called meeting where changes are presented is not collaborative. Further, the “common form” referenced by Miss. Code Ann. §37-101-29 is in fact developed exclusively by the Mississippi Department of Education, and requested data is at the sole discretion of the Mississippi Department of Education. Respectfully, we would welcome any representative of the Mississippi Department of Education or the State Board of Education to provide evidence of collaborative activities with the Mississippi Association of Colleges of Teacher Education and/or the Board of Trustees of State Institutions of Higher Learning</i></p>	<p><b>No Change Required.</b></p> <p>Mississippi Code Ann. §37-101-29 requires each institution of higher learning with a teacher education program approved by the State Board of Education to prepare and submit to the State Board of Education and to the Board of Trustees of State Institutions of Higher Learning an annual performance report on the institution’s teacher education program.</p> <p>Annual Performance Reports may be retrieved on the MDE website: <a href="https://www.mdek12.org/OTL/OEP">https://www.mdek12.org/OTL/OEP</a></p>



Summary of Comment	MDE Response
<p><i>which resulted in meaningful discussions around reporting measures and submission forms.</i></p> <p><i>For reference, at this point in time, the following data points are part of each bulleted point of</i></p> <p><i>Miss. Code Ann. §37-101-29:</i></p> <p><i>a) Teacher enrollment data—19 potential columns of data for each student</i></p> <p><i>b) Professional education faculty data—16 potential columns of data for each faculty member</i></p> <p><i>c) Characteristics of students receiving initial licensure—25 potential columns of data</i></p> <p><i>d) Number and percentage of program completers scoring at or above the proficiency level</i></p> <p><i>on the prescribed teacher education exit tests—This is the initial part of the Title II report which is due prior to the annual report of the Mississippi Department of Education.</i></p> <p><i>e) Satisfaction rate of employers and graduates—Survey developed by the EPP Collaborative of IHL/IHE institutions. The report requires that year 1 and year 3 completers and employers be emailed. EPPs must collect emails on each candidate.</i></p> <p><i>f) Follow-up profiles of graduates of the teacher education program; and</i></p> <p><i>g) Any other information required by the State Board of Education—The annual report is currently an excel workbook which is 11 sheets in length with 184 potential columns of data across all program admission, completions, and faculty.</i></p> <p><i>The burden in people hours required to provide data points, many of which are already reported to MDE, is incredibly high and detracts from the business of preparing future education candidates.</i></p>	

Summary of Comment	MDE Response
<p><b>The University of Southern Mississippi in reference to submission of statewide common assessment scores for all applicable programs (page 19)</b></p> <p><i>“Statewide common assessments are utilized by EPPs as part of the CAEP accreditation process. The use of these assessments allows for a reduction in the substantiation of sufficiency, reliability, and validity which EPPs would need to demonstrate on self-developed assessment instruments. However, each EPP retains the right to choose what assessments to utilize to meet accreditation and is under no accrediting requirement to use a common assessment. We would assert that this is a decision that should be left to each individual provider.”</i></p>	<p><b>No Change Required.</b></p> <p>Mississippi Code Ann. §37-3-2 provides authority to the Commission on Teacher and Administrator Education, Certification and Licensure and Development to make recommendations to the State Board of Education regarding standards for the certification and licensure of candidates prepared in Mississippi. Therefore, the MDE is within its authority to require common assessment score reports of candidates seeking licensure with the MDE. While the common assessments may be used by EPPs as a means to satisfy CAEP’s assessment criteria and ease the EPP’s burden of proving sufficiency, reliability, and validity of EPP created assessments, the MDE relies on the state common assessments to serve as one measure of candidate skill and knowledge that is consistent across all EPPs, which is a necessary component of program reviews required by the state and a necessary component for CAEP Standard 1. As stated in the CAEP/MDE Partnership Agreement:  <i>“3.1 The State has sole responsibility for program approval.”</i>  State program approvals are necessary in order for EPPs to fulfill CAEP requirements for Standard 1.</p>

Summary of Comment	MDE Response
<p><b>The University of Southern Mississippi in reference to submission of recruitment and/or sunseting plans for low enrollment and critical subject shortage programs (page 25).</b></p> <p><i>“Institutions of Higher Learning are required to meet metrics of program sustainability. Each individual institution also has quality improvement measures to ensure the viability of programs. This bullet begs the question of defining parameters and the responsible agency for doing so. We would offer that this item has the potential to see the Mississippi Department of Education assuming responsibilities of the Board of Trustees of State Institutions of Higher Learning.”</i></p>	<p><b>No Change Required.</b></p> <p>While IHL has authority over state IHEs, federal law, Title II, Section 207, of the Higher Education Act (HEA) as passed in 1998 requires states, as recipients of HEA funds, and all institutions with teacher preparation programs that enroll students receiving federal financial assistance, to prepare annual reports on teacher preparation and licensing and to identify both low-performing teacher preparation programs and those at-risk of being considered low performing and provide technical assistance to those programs. Low enrollment is just one measure of program efficacy the MDE has a responsibility to monitor. Recruitment plans will assist the MDE in its effort to support low enrollment EPP programs.</p>
<p><b>The University of Southern Mississippi in reference to candidates are prepared with the critical concepts, principles, and practices aligned to applicable state and national standards that ensure preparation for the recommended licensure area (page 27).</b></p> <p><i>“While no one would argue the point that candidates should be prepared for the classroom, this is a proposed change that does not recognize the nature of Education Preparation Providers. I would offer the current shift in state guidance toward the science of reading and a requirement that literacy courses align to International Literacy Association (ILA) and International Dyslexia Association (IDA) standards. It should be more than sufficient for licensure programs to align to national accreditation standards (CAEP) and the standards of Specialized Professional Associations (SPAs).”</i></p>	<p><b>No Change Required.</b></p> <p>Mississippi Code Ann. §37-3-2 provides authority to the Commission on Teacher and Administrator Education, Certification and Licensure and Development to make recommendations to the State Board of Education regarding standards for the certification and licensure of candidates prepared in Mississippi. Therefore, the MDE is within its authority to require licensure candidates be prepared with the skills and knowledge to teach reading based on the Science of Reading. Many states are now legislating such requirements for EPPs.</p> <p>The Mississippi State Board of Education and the Mississippi Legislature have</p>

Summary of Comment	MDE Response
	<p>committed substantial funding and human capital toward scaling the Science of Reading across the state. Aligning literacy coursework to these standards helps to ensure candidates have the skills and knowledge to teach reading based on the state’s commitment to the science and structured literacy.</p> <p>The Foundations of Reading examination, statutorily mandated in Miss. Code Ann. §37-3-2, is grounded in the ILA and IDA standards.</p> <p><a href="https://www.pearsonassessments.com/content/dam/school/global/clinical/us/assets/FOR-FLYER_FINAL_2017.pdf">https://www.pearsonassessments.com/content/dam/school/global/clinical/us/assets/FOR-FLYER_FINAL_2017.pdf</a></p>
<p><b>The University of Southern Mississippi in reference to the section on the Science of Reading and Structured Literacy Standards Alignment (page 60).</b></p> <p>To ensure licensure candidates are prepared with the skills and knowledge to effectively deliver literacy instruction grounded in the Science of Reading and Structured Literacy Practices as required in Miss. Codes Ann. § 37-177-1 and § 37-173-16 for professional educators, all literacy coursework in programs leading to licensure shall be aligned to the International Dyslexia Association’s 2018 Knowledge and Practice Standards for Teachers of Reading and the International Literacy Association’s Standards, 2017 (page ).</p> <p><i>“Miss. Codes Ann. § 37-177-1 and § 37-173-16 are state codes which are exclusively targeted at the P-12 literacy practices. These codes specify responsibility falls on the State Board of Education to ensure that local school districts are meeting dyslexia requirements and literacy-based promotion requirements. To extrapolate these two particular codes to Educator Preparation Providers is misleading. We believe that curriculum is the responsibility of the Institutions of Higher</i></p>	<p><b>No Change Required.</b></p> <p>The MDE agrees that Miss. Codes Ann. § 37-177-1 and § 37-173-16 are state codes which are exclusively targeted at the P-12 literacy practices. However, the citations are provided to undergird the need for licensure candidates to be prepared with strong foundational knowledge of the ILA and IDA standards which are vital to ensuring candidates are prepared to be effective day-one of teaching reading.</p> <p>It should be noted, the Foundations of Reading examination, statutorily mandated in Miss. Code Ann. §37-3-2, is grounded in the ILA and IDA standards.</p> <p><a href="https://www.pearsonassessments.com/content/dam/school/global/clinical/us/assets/FOR-FLYER_FINAL_2017.pdf">https://www.pearsonassessments.com/content/dam/school/global/clinical/us/assets/FOR-FLYER_FINAL_2017.pdf</a></p>

Summary of Comment	MDE Response
<p><i>Learning, and as such, should prepare entry-level educators. Attempting to utilize the EPP guidelines to move operational strategies intended for in-service educators and LEAs, puts unintended consequences on EPPs.</i></p> <p><i>For example, mandating particular course content and hours of delivery, will necessitate that EPPs hire faculty capable of delivering such instruction. This act would seem to give the Mississippi Department of Education influence, albeit indirect, over IHL budgets. Each time the guidelines have been changed to add a curriculum item, EPPs have had to make a corresponding curriculum change in the Undergraduate bulletins of the institution. In some areas, the changes have come so frequently, students in different classifications (freshmen, sophomore, etc.) have different advisement tracks. These are the types of unintended consequences that exist in the current pattern of Guideline modification.</i></p>	
<p><b>The University of Southern Mississippi in reference to the overall process for revising the Guidelines.</b></p> <p><i>“The overall question at hand is who has the responsibility for the quality of P-12 education. Recent changes to the Educator Preparation Provider Process and Performance Guidelines have been made unilaterally by the Mississippi Department of Education with little to no involvement of the Institutions of Higher Learning or their governing board, or MACTE. As such they have placed the Mississippi Department of Education in a position of having influence of curriculum, and thus, hiring practices and operations of EPPs. The resulting reporting structures create an undue hardship on faculty and administration of those institutions. We respectfully request that all changes to the Educator Preparation Provider Process and Performance Guidelines be tabled until such time as a truly collaborative group can design and propose a fair and relevant set of guidelines for educator preparation providers which rest governance of programs in the hands of the Institutions of Higher</i></p>	<p><b>No Change Required.</b></p> <p>Mississippi Code Ann. §37-3-2 provides authority to the Commission on Teacher and Administrator Education, Certification and Licensure and Development to make recommendations to the State Board of Education regarding standards for the certification and licensure of candidates prepared in Mississippi. Therefore, the MDE is within its authority to hold educator preparation providers responsible for preparing candidates with the skills, knowledge, and dispositions to be effective teachers and leaders in Mississippi schools</p>

Summary of Comment	MDE Response
<i>Learning or private institution boards; while vesting accreditation in the hands of national accreditors.”</i>	

**From:** Noal Cochran <Noal.Cochran@usm.edu>

**Sent:** Monday, March 20, 2023 9:25 AM

**To:** Licensure <licensure@mdek12.org>; Cory Murphy <cmurphy@mdek12.org>

**Subject:** APA Comments

### External Email

CAUTION: This email originated from outside of the MDE organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dr. Murphy,

The University of Southern Mississippi respectfully submits the following APA comments in regards to the revising of the EPP Process and Performance Guidelines.

## Noal B. Cochran, PhD

*Associate Dean, College of Education and Human Sciences  
Teaching Professor, School of Education*

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**SOUTHERN** | EDUCATION AND  
**MISS** | HUMAN SCIENCES

The recommendation is to revise Miss. Admin. Code Title 7: Part 107: 2021 Educator Preparation Provider Process and Performance [Guidelines](#).

Please submit written comments to **Dr. Cory Murphy**, Office of Teaching and Leading, 359 North West Street, Post Office Box 771, Jackson, MS 39205-0771. You may also submit comments in writing by email at ([licensure@mdek12.org](mailto:licensure@mdek12.org)).

All public comments must be received in the Division of Educator Licensure no later than **5:00 p.m. on March 22, 2023**. APA Comments will be presented to the SBE on **April 20, 2023**.

**Administrative Procedures Act (APA) Notice**  
**Proposed revision of Miss. Admin. Code Title 7: Part 107: 2021 Educator Preparation Provider Process and Performance Guidelines**

Any comments related to the EPP Process and Performance Guidelines must begin with the interpretation of Miss. Code Ann. §37-101-29. The Code section provides for the inclusion of data referenced in seven unique bullets:

- a) Teacher enrollment data;
- b) Professional education faculty data;
- c) Characteristics of students receiving initial licensure;
- d) Number and percentage of program completers scoring at or above the proficiency level on the prescribed teacher education exit tests;
- e) Satisfaction rate of employers and graduates;
- f) Follow-up profiles of graduates of the teacher education program; and
- g) Any other information required by the State Board of Education.

Bullet (g) goes on to say, “Before requiring any other information, the State Board of Education shall conduct collaborative planning activities with the Mississippi Association of Colleges of Teacher Education and the Board of Trustees of State Institutions of Higher Learning.

We can assert with great certainty that **such collaborative planning activities** have occurred sparingly or not at all prior to any of the most recent changes to EPP Process and Performance Guidelines. A singular or Mississippi Department of Education called meeting where changes are presented is not collaborative. Further, the “common form” referenced by Miss. Code Ann. §37-101-29 is in fact developed exclusively by the Mississippi Department of Education, and requested data is at the sole discretion of the Mississippi Department of Education. Respectfully, we would welcome any representative of the Mississippi Department of Education or the State Board of Education to provide evidence of collaborative activities with the Mississippi Association of Colleges of Teacher Education and/or the Board of Trustees of State Institutions of Higher Learning which resulted in meaningful discussions around reporting measures and submission forms.

For reference, at this point in time, the following data points are part of each bulleted point of Miss. Code Ann. §37-101-29:

- a) Teacher enrollment data—19 potential columns of data for each student
- b) Professional education faculty data—16 potential columns of data for each faculty member



- c) Characteristics of students receiving initial licensure—25 potential columns of data
- d) Number and percentage of program completers scoring at or above the proficiency level on the prescribed teacher education exit tests—This is the initial part of the Title II report which is due prior to the annual report of the Mississippi Department of Education.
- e) Satisfaction rate of employers and graduates—Survey developed by the EPP Collaborative of IHL/IHE institutions. The report requires that year 1 and year 3 completers and employers be emailed. EPPs must collect emails on each candidate.
- f) Follow-up profiles of graduates of the teacher education program; and
- g) Any other information required by the State Board of Education—**The annual report is currently an excel workbook which is 11 sheets in length with 184 potential columns of data across all program admission, completions, and faculty.**

The burden in people hours required to provide data points, many of which are already reported to MDE, is incredibly high and detracts from the business of preparing future education candidates.

**Comments related to specific proposed changes:**

EPPs shall include **all required elements needed to meet the requirements of Miss. Code Ann. §37-101-29 which includes but is not limited to:...**

- **statewide common assessment scores for all applicable programs.**

Statewide common assessments are utilized by EPPs as part of the CAEP accreditation process. The use of these assessments allows for a reduction in the substantiation of sufficiency, reliability, and validity which EPPs would need to demonstrate on self-developed assessment instruments. However, each EPP retains the right to choose what assessments to utilize to meet accreditation and is under no accrediting requirement to use a common assessment. We would assert that this is a decision that should be left to each individual provider.

Please provide the following contextual information:...

- **Recruitment and/or sunseting plans for low enrollment and critical subject shortage programs.**

Institutions of Higher Learning are required to meet metrics of program sustainability. Each individual institution also has quality improvement measures to ensure the viability of programs. This bullet begs the question of defining parameters and the responsible agency for doing so. We would offer that this item has the potential to see the Mississippi Department of Education assuming responsibilities of the Board of Trustees of State Institutions of Higher Learning.

Candidates are prepared with the critical concepts, principles, and practices aligned to **applicable state and national standards** that ensure preparation for the recommended licensure area.

While no one would argue the point that candidates should be prepared for the classroom, this is a proposed change that does not recognize the nature of Education Preparation Providers. I would offer the current shift in state guidance toward the science of reading and a requirement that literacy courses align to International Literacy Association (ILA) and International Dyslexia Association (IDA) standards. It should be more than sufficient for licensure programs to align to national accreditation standards (CAEP) and the standards of Specialized Professional Associations (SPAs).

### Science of Reading and Structured Literacy Standards Alignment

To ensure licensure candidates are prepared with the skills and knowledge to effectively deliver literacy instruction grounded in the Science of Reading and Structured Literacy Practices as required in Miss. Codes Ann. § 37-177-1 and § 37-173-16 for professional educators, all literacy coursework in programs leading to licensure shall be aligned to the International Dyslexia Association's 2018 Knowledge and Practice Standards for Teachers of Reading and the International Literacy Association's Standards, 2017.

Miss. Codes Ann. § 37-177-1 and § 37-173-16 are state codes which are exclusively targeted at the P-12 literacy practices. These codes specify responsibility falls on the State Board of Education to ensure that local school districts are meeting dyslexia requirements and literacy-based promotion requirements. To extrapolate these two particular codes to Educator Preparation Providers is misleading. We believe that curriculum is the responsibility of the Institutions of Higher Learning, and as such, should prepare *entry-level* educators. Attempting to utilize the EPP guidelines to move operational strategies intended for in-service educators and LEAs, puts unintended consequences on EPPs.

For example, mandating particular course content and hours of delivery, will necessitate that EPPs hire faculty capable of delivering such instruction. This act would seem to give the Mississippi Department of Education influence, albeit indirect, over IHL budgets. Each time the guidelines have been changed to add a curriculum item, EPPs have had to make a corresponding curriculum change in the Undergraduate bulletins of the institution. In some areas, the changes have come so frequently, students in different classifications (freshmen, sophomore, etc.) have different advisement tracks. These are the types of unintended consequences that exist in the current pattern of Guideline modification.

The overall question at hand is who has the responsibility for the quality of P-12 education. Recent changes to the **Educator Preparation Provider Process and Performance Guidelines** have been made unilaterally by the Mississippi Department of Education with little to no involvement of the Institutions of Higher Learning or their governing board, or MACTE. As

such they have placed the Mississippi Department of Education in a position of having influence of curriculum, and thus, hiring practices and operations of EPPs. The resulting reporting structures create an undue hardship on faculty and administration of those institutions. We respectfully request that all changes to the **Educator Preparation Provider Process and Performance Guidelines** be tabled until such time as a truly collaborative group can design and propose a fair and relevant set of guidelines for educator preparation providers which rest governance of programs in the hands of the Institutions of Higher Learning or private institution boards; while vesting accreditation in the hands of national accreditors.