

**OFFICE OF CHIEF ACCOUNTABILITY OFFICER**  
**Summary of State Board of Education Agenda Item**  
**Consent Agenda**  
**November 9, 2023**

**DIVISION OF EDUCATOR LICENSURE**  
**DIVISION OF EDUCATOR TALENT ACQUISITION AND EFFECTIVENESS**

- H. Approval to revise Miss. Admin. Code 7 – 4: Part 4: *Licensure Guidelines K-12* to establish Performance-Based Teacher License criteria as recommended by the Commission on Teacher and Administrator Education, Certification and Licensure and Development  
(Has cleared the Administrative Procedures Act process with public comments)

Background Information: On May 5, 2023, the Commission on Teacher and Administrator Education, Certification and Licensure and Development granted approval to establish Performance-Based Teacher License criteria as recommended by the Division of Educator Licensure and the Division of Educator Talent Acquisition and Effectiveness.

On June 13, 2019, the Mississippi State Board of Education granted approval to establish a Special, Non-renewable Performance-Based License for Prospective Teachers for those candidates accepted into the Performance-Based License (PBL) pilot study. The PBL pilot study was approved to be conducted during school years 2019-2020, 2020-2021, and 2021-2022. The study findings were then presented during both the Mississippi State Board of Education’s regularly scheduled meeting on January 19, 2023, and the Commission on Teacher and Administrator Education, Certification and Licensure and Development’s regularly scheduled meeting on March 3, 2023. As conducted by researchers at Harvard University, the study found that students assigned to PBL candidates perform about the same on required state assessments as students assigned to comparable teachers, across all years and comparison groups. The study also found several marginally statistically significant positive impacts on student attendance when assigned to a PBL candidate. Following each presentation, the study subsequently found statistically significant positive differences in educator effectiveness through Professional Growth System scores for PBL candidates as compared to other non-renewable licensed educators.

As a result of the study findings, recent stakeholder feedback, and a review of requirements related to PBL programming, the Division of Educator Licensure in collaboration with the Division of Educator Talent Acquisition and Effectiveness is seeking approval to include a Performance-Based Teacher License within the *Licensure Guidelines K-12*. Currently, the pathway would focus on Mississippi

Academic Assessment Program (MAAP) growth component subject areas in grades 5-8 even as the Office of Teaching and Learning continues to review all guidelines pertaining to the issuance, renewal, and reinstatement of an educator license to ensure that all requirements remain relevant to the contextual framework of present day.

The Performance-Based Teacher License will provide a statewide structure to organize procedures related to PBL candidates. Such procedures are designed to:

- I. Protect the health, safety, and general welfare of students and educators;
- II. Require attainment of all requirements therein for anyone receiving the Performance-Based License;
- III. Recognize PBL candidates' demonstration of the knowledge and skills necessary to positively impact student outcomes;
- IV. Ensure PBL teachers' access to effective and ongoing professional learning opportunities;
- V. Hold PBL teachers accountable under the Mississippi Educator Code of Ethics, Standards of Conduct; and
- VI. Standardize the criminal background check process across the state for performance-based licensure candidates thus eliminating those who are not eligible or suited to the profession.

The public comment period was open from May 19, 2023, through 5:00 p.m. on June 17, 2023, with public comments received. Based on the comments received, the MDE recommends no changes to the proposed policy based on the findings of the PBL pilot study.

Recommendation: Approval

Back-up material attached

**MISSISSIPPI DEPARTMENT OF EDUCATION  
PERFORMANCE-BASED TEACHER LICENSE**

The Performance-Based Teacher License provides a statewide structure to organize procedures related to Performance-Based License (PBL) candidates. Such procedures are designed to:

- (a) Protect the health, safety, and general welfare of students and educators;
- (b) Require attainment of all requirements therein for anyone receiving the Performance-Based License;
- (c) Recognize PBL candidates' demonstration of the knowledge and skills necessary to positively impact student outcomes;
- (d) Ensure PBL teachers' access to effective and ongoing professional learning opportunities;
- (e) Hold PBL teachers accountable under the Mississippi Educator Code of Ethics, Standards of Conduct; and
- (f) Standardize the criminal background check process across the state for performance-based licensure candidates thus eliminating those who are not eligible or suited to the profession.

**Requirements.**

To qualify for the Performance-Based Teacher License:

- (a) An applicant shall meet the following requirements:
  - 1. Standard Mississippi Licensure Application; and
  - 2. Local District Request; and
  - 3. Letter of Request and Justification; and
  - 4. Vita or résumé; and
  - 5. Official, sealed transcript(s) showing completion of at least bachelor's degree from an institution of higher education that was regionally/nationally accredited at the time the degree was conferred; and
  - 6. Documentation verifying at least three (3) years lead teaching experience (possibly as a long-term substitute, emergency, special non-renewable licensed teacher, or licensed out-of-content teacher) OR six (6) years of classroom experience (possibly as a teacher assistant) in an accredited public, private, elementary, or secondary (N-12) school; and

*Note:* Documentation may verify a combination of lead teaching and classroom experience provided that the total equals at least three (3) years with two (2) years of classroom experience (possibly as a teacher assistant) equating to one (1) year of lead teaching experience.

7. District assurance of previous positive student learning impact on existing pre-/post-assessments offered in the district.

(b) An applicant shall submit appropriate documentation indicating cleared criminal background check.

**Validity.** The Performance-Based Teacher License is valid for three (3) years, with the following exceptions:

- (a) Obtainment of a standard five (5)-year renewable license;
- (b) Rescinded if an individual withdraws, transfers or is removed as a Performance-Based Licensure Candidate.

**Requirements for a Three-Year Performance-Based Teacher License.**

1. Standard Mississippi Licensure Application; and
2. Local District Request; and
3. Letter of Request and Justification; and
4. Official, sealed transcript(s) showing completion of at least bachelor's degree from an institution of higher education that was regionally/nationally accredited at the time the degree was conferred; and
5. Documentation verifying at least three (3) years lead teaching experience (possibly as a long-term substitute, emergency, special non-renewable licensed teacher, or licensed out-of-content teacher) OR six (6) years of classroom experience (possibly as a teacher assistant) in an accredited public, private, elementary, or secondary (N-12) school; and

*Note:* Documentation may verify a combination of lead teaching and classroom experience provided that the total equals at least three (3) years with two (2) years of classroom experience (possibly as a teacher assistant) equating to one (1) year of lead teaching experience.

6. Evidence of previous positive student learning impact on existing pre-/post-assessments via district assurance; and
7. Placement within a Mississippi Academic Assessment Program (MAAP) growth component subject area in grades 5-8; and
8. Opportunities for PBL teachers to engage in ongoing professional learning experiences as aligned to the area of endorsement via district assurance; and
9. Training on the Mississippi Educator Code of Ethics, Standards of Conduct and hold Performance-Based Licensure candidates accountable under the Code throughout local school district placement via district assurance.

*Note:* The Three-Year Performance Based Teacher License is non-renewable but may be converted at any time during the three (3) year period once all requirements are met for the Five-Year Performance-Based Teacher License. The Five-Year Performance-Based Teacher License will only be granted in the licensure endorsement areas of English (7-12) or Mathematics (7-12).

### **Requirements for Converting to a Five-Year Performance-Based Teacher License.**

1. Standard Mississippi Licensure Application; and
2. Local District Request; and
3. Three-Year Performance-Based Teacher License; and
4. Evidence of teacher effectiveness as demonstrated by a summative Professional Growth System observation rating of 3.00 or higher during the Three-Year Performance-Based Teacher License; and
5. Evidence of teacher performance as demonstrated by the candidate meeting or exceeding the statewide average percentage of assigned students that have a growth score greater than zero in a MAAP assessed 5-8 subject area during the Three-Year Performance-Based Teacher License; and
6. District recommendation documenting completion of all requirements.

*Special Note:* Obtainment of a State Board of Education-approved Special, Non-Renewable Performance-Based License (PBL) for Prospective Teachers and evidence of positive student outcomes within the results of the PBL pilot shall meet the requirements for conversion to a Five-Year Performance Based Teacher License for those candidates in cohorts one (1), two (2), and three (3) who completed the PBL pilot study. The district shall only recommend the PBL candidate for the Five-Year Performance-Based Teacher License in the Special, Non-Renewable Performance-Based License (PBL) for Prospective Teachers licensure endorsement area if the individual completed the PBL pilot study.

#### **Specific restrictions apply:**

- The license is not transferable between Districts or eligible nonpublic schools, and a candidate shall be employed one (1) year with the local school district prior to transferring. If a candidate is employed one (1) year and wishes to transfer to another school district, the license is no longer valid, unless a new Local District Request is received by the Division of Educator Licensure from the local district to which the candidate is transferring. If the educator is nonrenewed by the local school district during the three-year license, the educator will not be issued a license for another district for the remaining years.
- The completed application packet shall be received by the Division of Educator Licensure within six (6) months of the PBL candidate meeting all requirements for the Five-Year Performance-Based Teacher License.
- Additional endorsements that may be added to the Performance-Based Teacher License by way of the acceptable coursework credit hours option or obtaining a qualifying passing score on an MDE-approved licensure subject assessment shall be requested by the candidate only.
- The Five-Year Performance-Based Teacher License will only be granted in the licensure endorsement areas of English (7-12) or Mathematics (7-12).

**MISSISSIPPI DEPARTMENT OF EDUCATION  
PERFORMANCE-BASED TEACHER LICENSE**

The Performance-Based Teacher License provides a statewide structure to organize procedures related to Performance-Based License (PBL) candidates. Such procedures are designed to:

- (a) Protect the health, safety, and general welfare of students and educators;
- (b) Require attainment of all requirements therein for anyone receiving the Performance-Based License;
- (c) Recognize PBL candidates' demonstration of the knowledge and skills necessary to positively impact student outcomes;
- (d) Ensure PBL teachers' access to effective and ongoing professional learning opportunities;
- (e) Hold PBL teachers accountable under the Mississippi Educator Code of Ethics, Standards of Conduct; and
- (f) Standardize the criminal background check process across the state for performance-based licensure candidates thus eliminating those who are not eligible or suited to the profession.

**Requirements.**

To qualify for the Performance-Based Teacher License:

- (a) An applicant shall meet the following requirements:

1. Standard Mississippi Licensure Application; and
2. Local District Request; and
3. Letter of Request and Justification; and
4. Vita or résumé; and
5. Official, sealed transcript(s) showing completion of at least bachelor's degree from an institution of higher education that was regionally/nationally accredited at the time the degree was conferred; and
6. Documentation verifying at least three (3) years lead teaching experience (possibly as a long-term substitute, emergency, special non-renewable licensed teacher, or licensed out-of-content teacher) OR six (6) years of classroom experience (possibly as a teacher assistant) in an accredited public, private, elementary, or secondary (N-12) school; and

Note: Documentation may verify a combination of lead teaching and classroom experience provided that the total equals at least three (3) years with two (2) years of classroom experience (possibly as a teacher assistant) equating to one (1) year of lead teaching experience.

7. District assurance of previous positive student learning impact on existing pre-/post-assessments offered in the district.

(b) An applicant shall submit appropriate documentation indicating cleared criminal background check.

**Validity.** The Performance-Based Teacher License is valid for three (3) years, with the following exceptions:

(a) Obtainment of a standard five (5)-year renewable license;

(b) Rescinded if an individual withdraws, transfers or is removed as a Performance-Based Licensure Candidate.

**Requirements for a Three-Year Performance-Based Teacher License.**

1. Standard Mississippi Licensure Application; and

2. Local District Request; and

3. Letter of Request and Justification; and

4. Official, sealed transcript(s) showing completion of at least bachelor's degree from an institution of higher education that was regionally/nationally accredited at the time the degree was conferred; and

5. Documentation verifying at least three (3) years lead teaching experience (possibly as a long-term substitute, emergency, special non-renewable licensed teacher, or licensed out-of-content teacher) OR six (6) years of classroom experience (possibly as a teacher assistant) in an accredited public, private, elementary, or secondary (N-12) school; and

Note: Documentation may verify a combination of lead teaching and classroom experience provided that the total equals at least three (3) years with two (2) years of classroom experience (possibly as a teacher assistant) equating to one (1) year of lead teaching experience.

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7. Placement within a Mississippi Academic Assessment Program (MAAP) growth component subject area in grades 5-8; and

8. Opportunities for PBL teachers to engage in ongoing professional learning experiences as aligned to the area of endorsement via district assurance; and

9. Training on the Mississippi Educator Code of Ethics, Standards of Conduct and hold Performance-Based Licensure candidates accountable under the Code throughout local school district placement via district assurance.

Note: The Three-Year Performance Based Teacher License is non-renewable but may be converted at any time during the three (3) year period once all requirements are met for the Five-Year Performance-Based Teacher License. The Five-Year Performance-Based Teacher License will only be granted in the licensure endorsement areas of English (7-12) or Mathematics (7-12).

### Requirements for Converting to a Five-Year Performance-Based Teacher License.

1. Standard Mississippi Licensure Application; and
2. Local District Request; and
3. Three-Year Performance-Based Teacher License; and
4. Evidence of teacher effectiveness as demonstrated by a summative Professional Growth System observation rating of 3.00 or higher during the Three-Year Performance-Based Teacher License; and
5. Evidence of teacher performance as demonstrated by the candidate meeting or exceeding the statewide average percentage of assigned students that have a growth score greater than zero in a MAAP assessed 5-8 subject area during the Three-Year Performance-Based Teacher License; and
6. District recommendation documenting completion of all requirements.

*Special Note:* Obtainment of a State Board of Education-approved Special, Non-Renewable Performance-Based License (PBL) for Prospective Teachers and evidence of positive student outcomes within the results of the PBL pilot shall meet the requirements for conversion to a Five-Year Performance Based Teacher License for those candidates in cohorts one (1), two (2), and three (3) who completed the PBL pilot study. The district shall only recommend the PBL candidate for the Five-Year Performance-Based Teacher License in the Special, Non-Renewable Performance-Based License (PBL) for Prospective Teachers licensure endorsement area if the individual completed the PBL pilot study.

### Specific restrictions apply:

- The license is not transferable between Districts or eligible nonpublic schools, and a candidate shall be employed one (1) year with the local school district prior to transferring. If a candidate is employed one (1) year and wishes to transfer to another school district, the license is no longer valid, unless a new Local District Request is received by the Division of Educator Licensure from the local district to which the candidate is transferring. If the educator is nonrenewed by the local school district during the three-year license, the educator will not be issued a license for another district for the remaining years.
- The completed application packet shall be received by the Division of Educator Licensure within six (6) months of the PBL candidate meeting all requirements for the Five-Year Performance-Based Teacher License.
- Additional endorsements that may be added to the Performance-Based Teacher License by way of the acceptable coursework credit hours option or obtaining a qualifying passing score on an MDE-approved licensure subject assessment shall be requested by the candidate only.
- The Five-Year Performance-Based Teacher License will only be granted in the licensure endorsement areas of English (7-12) or Mathematics (7-12).



**The Office of Teaching and Learning received the following APA comments regarding the establishment of a Performance-Based Teacher License.**

Summary of District Comments	MDE Response
<p><b>Sametra Brown</b> - The Mississippi Achievement School District (Yazoo City and Humphreys County) is pleased to see that MDE is proposing use of the PBL as a recruitment tool for teachers. However, the PBL requirements, as proposed, are not as beneficial as they could be to our district. Our district would like for MDE to consider reducing the 3-year lead teaching experience requirement to 1 year experience.</p>	<p><b>No change recommended.</b> As presented to the Mississippi State Board of Education on January 19, 2023, PBL pilot study candidate selection criteria included three (3) years lead teaching experience (e.g., long-term substitute) or 5 years classroom experience (e.g., teacher assistant). One (1) year of lead teaching experience has not been studied at this time to determine if positive effects in student outcomes and teacher effectiveness are like those of candidates within the PBL pilot study, who held at least three (3) years of lead teaching experience. However, the MDE continues to review all guidelines pertaining to the issuance of an educator license to ensure that all requirements remain relevant to the contextual framework of present day and will continue to review Performance-Based Teacher License criteria, making recommended changes as appropriate.</p>
<p><b>John-Mark Cain</b> - It is my opinion those with various Physical Education experience needs to be included in the proposal. Incorporating Physical Education (PE) experience as an option to secure a Performance-Based Teacher License is a logical and beneficial addition to the proposal.</p>	<p><b>No change recommended.</b> As presented to the Mississippi State Board of Education on January 19, 2023, PBL pilot study candidate selection criteria included three (3) years lead teaching experience (e.g., long-term substitute) or five (5) years classroom experience (e.g., teacher assistant). Experience specific to Physical Education (PE) has not been studied at this time to determine if positive effects in student outcomes and teacher effectiveness are like those of candidates within the PBL pilot study, who were not limited to PE-specific experience. However, the MDE continues to review all guidelines pertaining to the issuance of an educator license to ensure that all requirements remain relevant to the contextual framework of present day and will continue to review Performance-Based Teacher License criteria, making recommended changes as appropriate.</p>
<p><b>Tommy Nalls</b> - The PBL Program has already proven to have a positive impact in addressing the growing need for highly-qualified educators in our district. In Jackson Public Schools, the Performance-Based Licensure</p>	<p><b>No change recommended.</b> Comments support the establishment of a Performance-Based Teacher License as recommended by the Commission on Teacher and Administrator Education, Certification, and Licensure and Development.</p>

<p><b>Sylvester Cannon</b> - The PBL pilot program was a great benefit to Quitman County School District in the following ways:</p> <ul style="list-style-type: none"> <li>• It helped us to get credit for certified teachers in our classrooms.</li> <li>• The program was a godsend in that it allowed our most capable teachers to receive teachers' salary despite not having met all the state requirements to be a certified teacher.</li> </ul> <p>The program uplifted the teachers that took advantage of the program. It gave them professional development opportunities to improve their teaching practices.</p>	<p><b>No change recommended.</b> Comments support the establishment of a Performance-Based Teacher License as recommended by the Commission on Teacher and Administrator Education, Certification, and Licensure and Development.</p>
<p><b>Stanley Ellis</b> - The PBL program has played a significant role in creating a pipeline for quality teacher in Tunica County Schools while I was the assistant superintendent. As I am now the superintendent in Columbus Municipal School District, I can see how this program can help in many areas but specifically in the Middle School where teacher capacities are lacking.</p>	<p><b>No change recommended.</b> Comments support the establishment of a Performance-Based Teacher License as recommended by the Commission on Teacher and Administrator Education, Certification, and Licensure and Development.</p>
<p><b>Miskia Davis</b> - The Performance Based License has allowed us a unique opportunity to identify QUALIFIED individuals who simply aren't CERTIFIED. They are leaders in our buildings and have even been recognized as "Teachers of the Year" for their respective sites. The ONLY hinderance for them has been passing their required Praxis Exams. Their performance has proven that they can grow children and they represent some of the best who have helped our district become a high performing district.</p>	<p><b>No change recommended.</b> Comments support the establishment of a Performance-Based Teacher License as recommended by the Commission on Teacher and Administrator Education, Certification, and Licensure and Development.</p>

<b>Summary of Educator Comments</b>	<b>MDE Response</b>
<p><b>Teach Plus Mississippi Policy Fellows</b> - The proposed changes to Mississippi's licensure policies create a new pathway for aspiring teachers while maintaining a high bar for entry into the profession. Participating teachers must be college graduates, must be recommended by their school districts, and must commit to teaching for three years in a state-tested subject area in grades 5-8. PBL teachers can then earn a 5-year Performance-Based licensure once they've proven their effectiveness through both their summative ratings on the Professional Growth System and the growth their students achieve through MAAP testing. In short, this is NOT a lowering of standards to enter the teaching profession, but the creation of an additional pathway for aspiring teachers to obtain licensure.</p>	<p><b>No change recommended.</b> Comments support the establishment of a Performance-Based Teacher License as recommended by the Commission on Teacher and Administrator Education, Certification, and Licensure and Development.</p>
<b>Summary of Educator Preparation Provider Comments</b>	<b>MDE Response</b>
<p><b>David Rock</b> - If the goal is to increase the number of people entering the teaching profession, why are exceptions to 37-3-2 not included for traditional teacher preparation routes? The number of candidates entering and exiting educator preparation programs increased when COVID-19 Waivers for assessments were implemented. Please reconsider making exceptions for just one or two alternative programs. Per the MDE Licensure Guidelines, the Three-Year Alternate Route License also requires Passing Subject Area Assessments as well.</p>	<p><b>No change recommended.</b> Mississippi Code Annotated § 37-3-2(6)(a) states that teacher candidates in approved teacher education programs shall meet licensure testing criterion requirements. However, 37-3-2(6)(b)(iii) states such implementation of the TMI program may not be deemed to prohibit the State Board of Education from developing and implementing additional alternative route teacher licensure programs, as deemed appropriate by the board. Additionally, the PBL pathway is modeled after the Expert Citizen License established in 37-3-2(6)(c) which requires, at maximum, evidence of experience in the field the license is sought based on the rules and regulations adopted by the State Board of Education. PBL requires, as one criterion, documentation verifying at least three (3) years lead teaching experience (possibly as a long-term substitute, emergency, special non-renewable licensed teacher, or licensed out-of-content teacher) OR six (6) years of classroom experience (possibly as a teacher assistant) in an accredited public, private, elementary, or secondary (N-12) school. Finally, § 37-3-2(6)(d) authorizes the State Board of Education to establish rules and regulations to allow those educators not meeting the requirements in paragraph (a), (b), or (c) of</p>

<p>subsection (6) to be licensed for a period of more than three (3) years by special approval.</p>	<p><b>Mississippi Association of Colleges for Teacher Education (MACTE) Deans</b> - In an effort to uphold the integrity of the profession of education, and in an effort to attract and retain teachers in our state, the MACTE member deans/directors offer the following comments:</p> <ul style="list-style-type: none"> <li>• <b><u>Issue 1: MACTE does not support a licensure pathway that circumvents statutory requirements noted in Miss. Code Ann. 37-3-2.</u></b></li> <li>• <b><u>Issue 2: MACTE has serious concerns related to the negative impact PBL will have on current and traditional alternate route programming.</u></b></li> </ul>
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subsection (6) to be licensed for a period of more than three (3) years by special approval.

**No change recommended.** Regarding Issue 1: Mississippi Code Annotated § 37-3-2 (6)(a) states that teacher candidates in approved teacher education programs shall meet licensure testing criterion requirements. However, 37-3-2(6)(b)(iii) states such implementation of the TMI program may not be deemed to prohibit the State Board of Education from developing and implementing additional alternative route teacher licensure programs, as deemed appropriate by the board. Additionally, the PBL pathway is modeled after the Expert Citizen License established in 37-3-2(6)(c) which requires, at maximum, evidence of experience in the field the license is sought based on the rules and regulations adopted by the State Board of Education. PBL requires, as one criterion, documentation verifying at least three (3) years lead teaching experience (possibly as a long-term substitute, emergency, special non-renewable licensed teacher, or licensed out-of-content teacher) OR six (6) years of classroom experience (possibly as a teacher assistant) in an accredited public, private, elementary, or secondary (N-12) school. Finally, § 37-3-2(6)(d) authorizes the State Board of Education to establish rules and regulations to allow those educators not meeting the requirements in paragraph (a), (b), or (c) of subsection (6) to be licensed for a period of more than three (3) years by special approval.

Regarding Issue 2: Despite district requests to the contrary, the proposed requirements are limited in scale by experience and subject area as a result of PBL pilot study findings. The proposed requirements for a Three-Year Performance-Based Teacher License at minimum include, but are not limited to, a bachelor's degree, at least three (3) years of leading teaching experience, and placement within a Mississippi Academic Assessment Program (MAAP) growth component subject area in grades 5-8. Following successful completion of all requirements, candidates would then be eligible for

<p>conversion to a Five-Year Performance-Based Teacher License in English (7-12) or Mathematics (7-12). Under the proposed criteria, applicants would need a combined total of at least seven (7) years of postsecondary education and classroom experience to be eligible for the Three-Year Performance-Based Teacher License. This represents a longer timeframe than current and traditional alternate programs which result in a standard, renewable five-year license.</p> <p>Given the provisions outlined in § 37-3-2 and the admittedly limited scale of the proposed Performance-Based Teacher License, the MDE remains willing to work with MACTE Deans on a possible preparation and performance-based pathway as it has with the Institutions for Higher Learning (IHL) Commissioner in the past.</p>	<p>conversion to a Five-Year Performance-Based Teacher License in English (7-12) or Mathematics (7-12). Under the proposed criteria, applicants would need a combined total of at least seven (7) years of postsecondary education and classroom experience to be eligible for the Three-Year Performance-Based Teacher License. This represents a longer timeframe than current and traditional alternate programs which result in a standard, renewable five-year license.</p> <p>Given the provisions outlined in § 37-3-2 and the admittedly limited scale of the proposed Performance-Based Teacher License, the MDE remains willing to work with MACTE Deans on a possible preparation and performance-based pathway as it has with the Institutions for Higher Learning (IHL) Commissioner in the past.</p>
<p><b>MDE Response</b></p> <p><u>No change recommended.</u> Comments received do not reflect experiences with the PBL pilot or study findings. However, the MDE continues to review all guidelines pertaining to the issuance of an educator license to ensure that all requirements remain relevant to the contextual framework of present day and will continue to review Performance-Based Teacher License criteria, making recommended changes as appropriate.</p>	<p><b>Summary of Education Stakeholder Comments</b></p> <p><b>Lela Hale</b> - I am writing concerning the upcoming proposal for the Performance-Based Teacher License (PBTL). Having read the proposal, I have several concerns.</p> <ul style="list-style-type: none"> <li>• Not all school districts are created equally, which is obvious by the various district A-F ratings. Having taught in Sunflower, Union, and Marshall counties, I realize some districts have more resources and support than others.</li> <li>• Teacher candidates must plan, practice, teach, revise, and do all those things again. I have met some administrators who can help in that area, but they are not the majority.</li> <li>• The 3.00 on the Professional Growth System should be used as it is now for teacher performance once they have become a teacher, not for licensing.</li> <li>• Additionally, I understand that the MDE would rather not monitor professional development opportunities as aligned to the area of endorsement, but it would be nice for the MDE to have targeted choices of professional learning experiences from which to choose verses the school district assurance.</li> </ul>

**The Office of Teaching and Leading received the following comments from Districts regarding the establishment of a Performance-Based Teacher License prior to the Administrative Procedures Act (APA) deadline.**

Start of Public Comment Submitted (Received June 7, 2023 – 3:56pm):

Good afternoon,

Please see the comments below regarding the Performance-Based Teacher License criteria:

The Mississippi Achievement School District (Yazoo City and Humphreys County) is pleased to see that MDE is proposing use of the PBL as a recruitment tool for teachers. However, the PBL requirements, as proposed, are not as beneficial as they could be to our district. Our district would like for MDE to consider reducing the 3-year lead teaching experience requirement to 1 year experience. Our district consists of more 1-year special nonrenewable licenses and licensed out-of-content teachers. As a result of this, we have 18 vacancies in grades 5-8 in MAAP growth component subject areas. By lowering the requirements from 3 years to 1 year, our district will be able to retain these 18 teachers, plus use this as a recruitment tool to regain the numerous 1-year teachers who had a positive impact on student outcomes but couldn't meet the yearly requirements.

Sametra D. Brown, Ed.D.  
Executive Director of Human Capital and Talent Management  
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**From:** Dr. John-Mark Cain <jcain@lauderdale.k12.ms.us>  
**Sent:** Friday, June 9, 2023 11:44 AM  
**To:** Licensure <licensure@mdek12.org>  
**Subject:** APA Comments PBTL

Dr. Murphy,

Please accept my comments relating to the proposal.

Thank you,  
Dr. Cain

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John-Mark Cain, Ph. D.  
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Lauderdale County School District  
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June 7, 2023

To Whom It May Concern,

It is my opinion those with various Physical Education experience needs to be included in the proposal. Incorporating Physical Education (PE) experience as an option to secure a Performance-Based Teacher License is a logical and beneficial addition to the proposal. Here are several arguments supporting this proposition:

1. Holistic development : Physical Education plays a vital role in fostering holistic development in students. It promotes physical fitness, motor skills, teamwork, discipline, and overall well-being. By including PE experience as a requirement, it ensures that teachers have a comprehensive understanding of the importance of physical activity and can contribute effectively to the students' overall development .
2. Health and wellness education: Physical Education is a critical component of health and wellness education. It equips students with knowledge about healthy habits, nutrition, and the importance of regular exercise. By requiring teachers to have PE experience, it ensures that they possess the necessary knowledge and skills to educate students about leading a healthy lifestyle, ultimately promoting lifelong wellness.
3. Classroom management skills: Physical Education classes require effective classroom management skills. Teachers must handle large groups of students engaged in physical activities, ensuring safety, discipline, and engagement. By incorporating PE experience as a requirement, it ensures that teachers have experience in managing diverse student groups effectively, which can be applied to other classroom settings as well.
4. Inclusive education: Physical Education is an inclusive subject that caters to students with diverse abilities and interests. By requiring teachers to have PE experience, it ensures that they are equipped with the necessary skills to create inclusive environments and adapt activities to meet the needs of all students. This inclusivity mindset can also be transferred to other subjects and classroom settings, fostering a more inclusive and supportive learning environment.
5. Well-rounded teachers: Including PE experience as an option for a Performance-Based Teacher License encourages the development of well-rounded teachers. Teachers with diverse experiences are better equipped to address the varied needs and interests of their students. By having a background in Physical Education, teachers can bring a unique perspective and offer a broader range of learning opportunities to their students, enhancing the overall quality of education .
6. Interdisciplinary connections: Physical Education provides opportunities for interdisciplinary connections, linking concepts from science, math, and even the arts. By requiring teachers to have PE experience, it encourages the integration of different subjects and promotes a multidisciplinary approach to teaching. This can enhance students' understanding of various topics, stimulate their creativity, and foster critical thinking skills.

By including Physical Education experience as an option to secure a Performance-Based Teacher License, we promote the importance of holistic development, health education, classroom management, inclusivity, well-rounded teaching, and interdisciplinary connections. This inclusion of PBTL qualifiers helps us further include educators with diverse skill set who are better equipped to meet the needs of their students in today's educational landscape with experience in physical education, fitness, and/or health in a non-traditional classroom setting.

Sincerely,

John-Mark Cain, Ph. D.  
Superintendent, Lauderdale County School District

**John-Mark Cain, Ph.D., Superintendent of Education**  
301 46<sup>th</sup> CT, Meridian, Mississippi 39305 - (601) 693-1683 - [www.lauderdale.k12.ms.us](http://www.lauderdale.k12.ms.us)



**From:** Tommy Nalls <tnalls@jackson.k12.ms.us>

**Sent:** Friday, June 16, 2023 3:57 PM

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

**Cc:** Courtney Van Cleve <cvancleve@mdek12.org>

**Subject:** The Benefits of Performance-Based Licensure Program as an Alternate Route Teacher Certification for Jackson Public School District

Good afternoon Dr. Murphy,

I hope this letter finds you in good health and high spirits. I am writing to express my strong support for the implementation of the Performance-Based Licensure (PBL) Program as an approved Alternate Route Teacher Certification pathway within the state of Mississippi. As an invested member of the Jackson Public Schools community and a passionate advocate for quality education, I firmly believe that this initiative will bring significant benefits to Mississippi, Jackson Public Schools, and its students.

The PBL Program has already proven to have a positive impact in addressing the growing need for highly-qualified educators in our district. This program offers an innovative approach to assessing a teacher's competence and effectiveness by emphasizing performance-based evaluation rather than solely relying on traditional academic qualifications. By shifting the focus to practical skills, instructional techniques, and measurable outcomes, we can ensure that teachers that utilize this pathway for certification in Mississippi are equipped with the necessary tools to deliver high-quality instruction and foster student success.

One of the primary advantages of the PBL Program is its ability to attract a diverse pool of talented individuals who may not have been able to complete the traditional and approved non-traditional paths to becoming a teacher. The development of the PBL program serves as evidence that we recognize there are passionate and dedicated individuals within our community who possess valuable subject matter expertise and a deep commitment to education. However, many of these individuals need assistance obtaining certification. By providing an accessible pathway for these professionals to obtain teacher certification, we can tap into a wealth of experience, knowledge, and skills that will enrich the educational environment in Mississippi.

In Jackson Public Schools, the Performance-Based Licensure Program has encouraged continuous professional development and growth among our program participants. By focusing on teacher performance, the PBL program promotes a culture of ongoing learning, reflection, and improvement. Our program participants have worked tirelessly to refine their instructional practices, incorporate research-based strategies, and adapt to the evolving needs of their students. As a result, the program has contributed to the overall enhancement of teaching quality and student outcomes in our district.

By implementing the Performance-Based Licensure Program as an Alternate Route Teacher Certification pathway, Jackson Public School District will also benefit from increased flexibility in

recruitment. This initiative will attract individuals with diverse backgrounds, including professionals from industries relevant to the needs and aspirations of our students. These individuals will bring unique perspectives, real-world experiences, and specialized skills that can enhance classroom instruction and provide valuable role models for our students.

I strongly urge the Mississippi Department of Education to consider the implementation of the Performance-Based Licensure Program as an Alternate Route Teacher Certification pathway. This initiative offers a transformative approach to teacher certification, attracting talented individuals, promoting continuous professional growth, and ultimately improving the quality of education for our students. I am confident that this program will have a positive and lasting impact on our district's educational landscape.

I appreciate your dedication to providing the best possible educational opportunities for the students at Jackson Public School District. I look forward to witnessing the positive outcomes that will arise from the implementation of the PBL Program.

Sincerely,

**Tommy Nalls, Jr. Ed.D.**

**Director of Recruitment|Jackson Public Schools**

**Phone 601-985-3159**

**Fax 601-352-4679**

**Email: [tnalls@jackson.k12.ms.us](mailto:tnalls@jackson.k12.ms.us)**

**Click [here](#) to schedule a call back from the recruiter!**

**Click [here](#) to start an application for employment!**



**From:** Sylvester Cannon <sylvestercannon@qcsd.k12.ms.us>

**Sent:** Friday, June 16, 2023 4:32 PM

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

**Subject:** Public Comment Concerning PBL

To Whom It May Concern:

The PBL pilot program was a great benefit to Quitman County School District in the following ways: It helped us to get credit for certified teachers in our classrooms.

The program was a godsend in that it allowed our most capable teachers to receive teachers' salary despite not having met all the state requirements to be a certified teacher.

The program uplifted the teachers that took advantage of the program. It gave them professional development opportunities to improve their teaching practices. Experienced mentors were provided, which gave them guidance and a listening ear.

The program was an alternate pathway to certification that worked in the favor of many teachers who just are not avid test takers.

Moving forward, this program will allow us to utilize candidates who are in the same situation and can not obtain a teaching license.

This alternate route program will allow more teachers into the field of education.

**From:** Dr. Stanley K. Ellis <EllisS@columbuscityschools.org>

**Sent:** Saturday, June 17, 2023 6:36 AM

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

**Subject:** AP PBL Statement

The PBL program has played a significant role in creating a pipeline for quality teacher in Tunica County Schools while I was the assistant superintendent. As I am now the superintendent in Columbus Municipal School District, I can see how this program can help in many areas but specifically in the Middle School where teacher capacities are lacking. This program is very much needed in my current district.

Dr. Stanley K. Ellis

**From:** Miskia Davis <mdavis@sunflowerk12.org>  
**Sent:** Saturday, June 17, 2023 11:57 AM  
**To:** Licensure <licensure@mdek12.org>  
**Subject:** PBL Support

As Superintendent of the Sunflower County Consolidated School District here in the Mississippi Delta, “equity” is a word that I hear a lot, but rarely see tangible examples. In our school district and others like it here in our area, there will likely always be a teacher shortage. Career and recruitment fairs have shown us that there are no amount of incentives or programs that can be created that will encourage people to move to the Mississippi Delta long term. Our best investment has been and continues to be our people. The Performance Based License has allowed us a unique opportunity to identify QUALIFIED individuals who simply aren’t CERTIFIED. They have served in the district as assistant teachers and emergency licensed teachers. Their data indicates they have successfully been able to educate our children. They are leaders in our buildings and have even been recognized as “Teachers of the Year” for their respective sites. The ONLY hinderance for them has been passing their required Praxis Exams. Their performance has proven that they can grow children and they represent some of the best who have helped our district become a high performing districy despite not having 100% of our teachers being highly qualified. The PBL program is a realistic equitable pathway for our school district because it ensures our students are being taught by the best individuals that our area has to offer.

--

**#TheException**

**Miskia Davis, Ed.D.**  
**Superintendent**  
Sunflower County Consolidated Schools  
196 MLK, Jr. Drive | Indianola, MS | 38751  
Tel (662) 887-4919

**The Office of Teaching and Leading received the following comments from Educators regarding the establishment of a Performance-Based Teacher License prior to the Administrative Procedures Act (APA) deadline.**

**From:** Sanford Johnson <sjohnson@teachplus.org>  
**Sent:** Saturday, June 17, 2023 3:58 PM  
**To:** Cory Murphy <cmurphy@mdek12.org>  
**Subject:** Public Comment re: Performance-Based License

Dear Dr. Murphy,

I'm writing on behalf of Teach Plus MS Policy Fellows to submit public comment regarding the proposed creation of the Performance-Based Licensure pathway. We strongly support the creation of this pathway and we urge the State Board to approve it during their next meeting.

Please let me know if there's any additional information we can provide.

Sincerely,

Sanford

**To:** Dr. Cory Murphy, Associate State Supt.  
Mr. Glen East, Chair of State Board of Ed.  
**From:** Teach Plus Mississippi Policy Fellows  
**Subject:** Public Comment for Proposed Performance  
Based Licensure Pathway  
**Date:** June 17, 2023



**“The Performance-Based Licensure Program has been the tool needed to help many great teachers; those who are great at educating children but just not good test takers.”**  
- Mississippi educator

The Teach Plus Mississippi Policy Fellowship consists of 25 teacher leaders from over 20 school districts in the Magnolia State. We recognize that one of the most important things our state can do for educational equity is ensure that new teachers are well-prepared and positioned for success as they enter the classroom. This includes maintaining a high bar for educator prep and licensure programs, while recognizing the need for multiple pathways that reflect the diverse backgrounds and experiences of our current and future teacher workforce. To that end, several of our Policy Fellows have focused on teacher licensure policies as a means to strengthen our educator pipeline.

We are writing to strongly support the proposed addition of the Performance-Based License (PBL) to our current licensure policies. This license will allow schools to retain great teachers and fill the gap for teacher shortages, especially in disadvantaged communities where effective teachers are needed most. As one educator recently noted, “I think this pathway will allow schools to retain a lot of great teachers.”

## Lessons Learned from Educators

Over the past year, Teach Plus teacher leaders have engaged with several educators to learn more about our licensure policies, and the barriers that may keep aspiring teachers from the classroom. This engagement has included...

- + Interviews with 17 deans, department chairs, and professors from eleven educator prep programs in Mississippi to learn how the waiver of licensure exam requirements have impacted the teacher pipeline;
- + A survey of 64 current or former participants of the PBL pilot program to learn about their satisfaction with the program and their preparedness for the classroom.; and...
- + Interviews with 4 experienced teachers who have shared stories about their licensure experiences.

The interviews and survey we’ve conducted on licensure policies have revealed the following findings:

- + The waiver of PRAXIS exam requirements during the COVID-19 pandemic, which lead to an unprecedented increase in educator prep program enrollment and completion, created a strong cohort of new teachers recognized by EPP leaders for their “years of experience, connection and commitment to their communities, and the relationships they established with their students and colleagues”.
- + 62 of the 64 current or former PBL pilot participants who [responded to our survey](#) felt “very prepared” or “somewhat prepared” in each of the four domains of the Professional Growth System. In fact, at least 70% of respondents felt “very prepared” in each domain.
- + The teachers we heard from on licensure policies were unequivocal in their belief that licensure exams cannot - and should not - be a sole determinant of a teacher’s effectiveness. Whether

they were licensed before or after, teachers stated that their on the job performance is what best shaped them to become effective teachers’.

In addition to our findings, an [evaluation of the PBL pilot](#), conducted by the Harvard Graduate School of Education, indicated that the students of PBL teachers “perform about the same as students assigned to comparable teachers, across all years and comparison groups. Students of PBL teachers were also noted to have fewer absences than students of comparable teachers.

## Strong Support for the Performance Based Licensure Pathway

The proposed changes to Mississippi’s licensure policies create a new pathway for aspiring teachers while maintaining a high bar for entry into the profession. Participating teachers must be college graduates, must be recommended by their school districts, and must commit to teaching for three years in a state-tested subject area in grades 5-8. PBL teachers can then earn a 5-year Performance-Based licensure once they’ve proven their effectiveness through both their summative ratings on the Professional Growth System and the growth their students achieve through MAAP testing. In short, this is NOT a lowering of standards to enter the teaching profession, but the creation of an additional pathway for aspiring teachers to obtain licensure.

We are very appreciative of the work MDE has done to thoughtfully create this new pathway to aspiring teachers. We ask the State Board of Education to approve the proposed changes and support this effort to strengthen our teacher pipeline.

## 2022-23 Teach Plus Mississippi Policy Fellows

**Andrew Huey**, Long Beach School District

**Evonie Rash**, Hollandale School District

**Joviladra Blake**, Clarksdale Municipal School District

**Lakima Ross**, Leflore Legacy Academy

**Mary Hill Taylor**, Choctaw Tribal Schools

**Drew Hall**, Quitman County School District\*

\*Senior Policy Fellow

**Sanford Johnson**, Teach Plus MS Executive Director

### About Teach Plus Mississippi

The mission of Teach Plus is to empower excellent, experienced, and diverse teachers to take leadership over key policy and practice issues that advance equity, opportunity, and student success. In pursuing this mission, Teach Plus is guided by the Student Opportunity Mandate: All students should have the opportunity to achieve their potential in an education system defined by its commitment to equity, its responsiveness to individual needs, and its ability to prepare students for postsecondary success.



**The Office of Teaching and Leading received the following comments from Educator Preparation Providers regarding the establishment of a Performance-Based Teacher License prior to the Administrative Procedures Act (APA) deadline.**

Start of Public Comment Submitted (Received June 7, 2023 – 5:00pm):

Dear Dr. Murphy.

I am concerned that the Performance-Based Teacher License recommendation does not include the minimum requirements for licensure in the state of Mississippi especially for Elementary Education. The state of Mississippi has increased requirements for entrance into a teacher education program as well added additional expectations for licensure to include the passing of the Foundations of Reading Assessment.

Per 37-3-2, no teacher candidate shall be licensed to teach in Mississippi who did not meet the following criteria for entrance into an approved teacher education program

1. An ACT Score of twenty-one (21) (or SAT equivalent); or
2. Achieve a qualifying passing score on the Praxis Core Academic Skills for Educators examination as established by the State Board of Education; or
3. A minimum GPA of 3.0 on coursework prior to admission to an approved teacher education program.

Also,

A copy of test scores evidencing satisfactory completion of nationally administered examinations of achievement, such as the Educational Testing Service's teacher testing examinations;

This includes the passing score for the Foundations of Reading Assessment

If the goal is to increase the number of people entering the teaching profession, why are exceptions to 37-3-2 not included for traditional teacher preparation routes? The number of candidates entering and exiting educator preparation programs increased when COVID-19 Waivers for assessments were implemented. Please reconsider making exceptions for just one or two alternative programs. Per the MDE Licensure Guidelines, the Three Year Alternate Route License also requires Passing Subject Area Assessments as well.

**Administrative Procedures Act (APA) Notice**

**Office of Chief Accountability Officer**

**Proposed revision of Miss. Admin. Code 7-4: Part 4: Licensure Guidelines K-12**

On **May 18, 2023**, the State Board of Education (SBE) granted approval to begin the Administrative Procedures Act (APA) process to revise the following:

The recommendation is to revise Miss. Admin. Code 7-4: Part 4: Licensure Guidelines K-12 to establish [Performance-Based Teacher License](#) criteria.

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 June 17, 2023**. APA Comments will be presented to the SBE on **July 27, 2023**.

Thank you for your consideration,

DR

Dr. David Rock  
Dean, School of Education  
The University of Mississippi  
Guyton Hall  
P. O. Box 1848  
University, MS 38677-1848  
[+1-662-915-8063](tel:+16629158063)  
[rock@olemiss.edu](mailto:rock@olemiss.edu) | [education.olemiss.edu](http://education.olemiss.edu)

**From:** Trenton Gould <Trent.Gould@usm.edu>

**Sent:** Friday, June 16, 2023 12:32 PM

**To:** Licensure <licensure@mdek12.org>

**Cc:** Cory Murphy <cmurphy@mdek12.org>; Debra Burson <dburson@mdek12.org>; Casey Prestwood <cprestwood@ihl.state.ms.us>

**Subject:** MACTE PBL Response

Dr. Murphy,

Attached, please find MACTE's response to the APA call for written comments regarding the proposed revisions to Miss. Admin. Code 7-4: Part 4: Licensure Guidelines K-12 to establish Performance-Based Teacher Licensure criteria.

Dr. Gould

## **Trenton E. Gould, PhD**

*Dean, College of Education and Human Sciences*

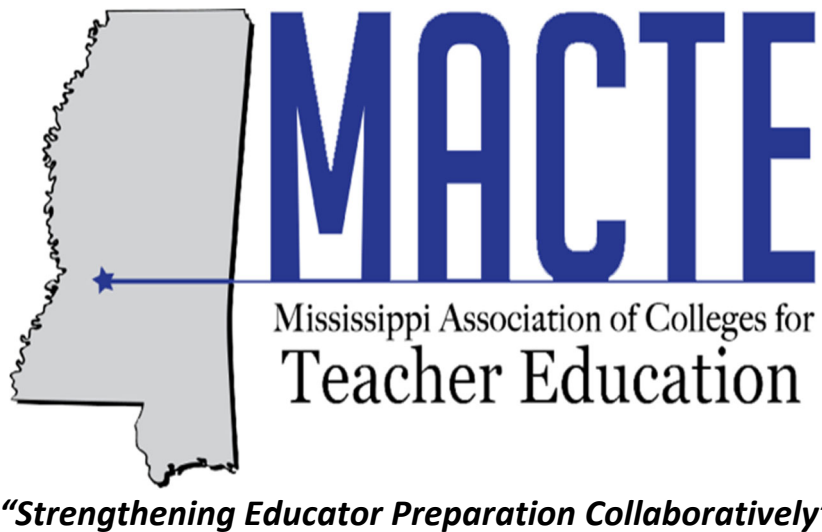
*Professor, School of Kinesiology and Nutrition*

The University of Southern Mississippi

118 College Dr. #5023 | Hattiesburg, MS 39406

Phone: 601.266.5253 | Office: JGH 143

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



To: Dr. Cory Murphy

From: MACTE Deans

The following comments are respectfully submitted in response to the Administrative Procedures Act (APA) Notice proposing revisions to Miss. Admin. Code 7-4: Part 4: Licensure Guidelines K-12 to establish Performance-Based Licensure criteria.

MACTE is composed of representatives from each college and university in Mississippi with an Educator Preparation Program (EPP). MACTE is committed to ensuring competent and caring educators for all of Mississippi's children and youth and to providing leadership in Mississippi for the continuing transformation of professional educator preparation programs. In an effort to uphold the integrity of the profession of education, and in an effort to attract and retain teachers in our state, the MACTE member deans/directors offer the following comments:

**Issue 1: MACTE does not support a licensure pathway that circumvents statutory requirements noted in Miss. Code Ann. 37-3-2.**

The current PBL proposal (page 2) reads:

**Requirements for a Three-Year Performance-Based Teacher License.**

1. Standard Mississippi Licensure Application; and
2. Local District Request; and
3. Letter of Request and Justification; and
4. Official, sealed transcript(s) showing completion of at least bachelor's degree from an institution of higher education that was regionally/nationally accredited at the time the degree was conferred; and
5. Documentation verifying at least three (3) years lead teaching experience (possibly as a long-term substitute, emergency, special non-renewable licensed teacher, or licensed out-of-content teacher) OR six (6) years of classroom experience (possibly as a teacher assistant) in an accredited public, private, elementary, or secondary (N-12) school; and

*Note:* Documentation may verify a combination of lead teaching and classroom experience provided that the total equals at least three (3) years with two (2) years of classroom experience (possibly as a teacher assistant) equating to one (1) year of lead teaching experience.

6. Evidence of previous positive student learning impact on existing pre-/post-assessments via district assurance; and

7. Placement within a Mississippi Academic Assessment Program (MAAP) growth component subject area in grades 5-8; and

8. Opportunities for PBL teachers to engage in ongoing professional learning experiences as aligned to the area of endorsement via district assurance; and

9. Training on the Mississippi Educator Code of Ethics, Standards of Conduct and hold Performance-Based Licensure candidates

Per Miss. Code Ann. 37-3-2 (6)(a)(v):

From and after July 1, 2020, no teacher candidate shall be licensed to teach in Mississippi who did not meet the following criteria for entrance into an approved teacher education program:

1. An ACT Score of twenty-one (21) (or SAT equivalent); or
2. Achieve a qualifying passing score on the Praxis Core Academic Skills for Educators examination as established by the State Board of Education; or
3. A minimum GPA of 3.0 on coursework prior to admission to an approved teacher education program.

All traditional (approved program) and nontraditional (alternate route) education program completers must comply with the 37-3-2 statutory requirements. However, the proposed Performance-Based License does not require non-education baccalaureate completers to comply with the same 37-3-2 statutory requirements. By not requiring 37-3-2, the agency is creating a double standard of entrance assessments to becoming a licensed teacher for those seeking Performance Based Licensure. The resulting reduction in emotional and financial cost for candidates would unfairly hinder traditional and alternate route programs' ability to recruit and retain future educators.

**Issue 2: MACTE has serious concerns related to the negative impact PBL will have on current and traditional alternate route programming.**

The proposed revisions to Miss. Admin. Code 7-4: Part 4: Licensure Guidelines K-12 to establish Performance-Based Licensure criteria will have an unintended consequence for all Institutions of Higher Education (IHEs). By not requiring 37-3-2, the agency is creating a double standard to becoming a licensed teacher. Students will decide not to incur the physical, emotional, and financial cost of traditional, alternate route, or teacher assistant programs when they can simply get a degree in any discipline that does not have the additional requirements. MACTE deans/directors agree that alternate route and teacher assistant program enrollment will be immediately affected followed closely by traditional program enrollment. Subsequent to enrollment decline caused by PBL, MACTE deans/directors are concerned that several programs would have to either go inactive or be deleted altogether from institutional program inventories due to not meeting minimum institutional (or IHL) performance metrics. As such,

the unintended consequence of the Performance-Based Licensure will be an unrecoverable decrease in traditional and alternate route teacher education enrollment across the entire public and private system.

**Overall Recommendations:**

**MACTE recommends that Performance-Based Licensure be tabled pending:**

- 1. Collaborative discussion with the MACTE deans/directors that includes an opportunity to offer solutions to unintended consequences.**
- 2. Presentation of Performance-Based Licensure requirements and potential for unintended consequences to IHE Presidents/Provosts to allow feedback on enrollment consequences and offer solutions.**
- 3. Presentation of Performance-Based Licensure requirements and potential for unintended consequences to the Institutions for Higher Learning (IHL) Commissioner to determine potential for system-wide enrollment consequences.**

Sincerely,



Trenton E. Gould  
President, MACTE  
Dean, University of Southern Mississippi

LaShundia Carson  
Alcorn State University

David Hand  
Bellhaven University

Jenetta Waddell  
Blue Mountain College

Leslie Griffin  
Delta State University

Jerri Haynes  
Jackson State University

Cindy Melton  
Mississippi College

Terry Jayroe  
Mississippi State University

Martin Hatton  
Mississippi University for Women

Theresa Dumas  
Mississippi Valley State University

Mechickia Brooks  
Rust College

Andrea Montgomery  
Tougaloo College

David Rock  
University of Mississippi

Teresa Poole  
William Carey University

**The Office of Teaching and Leading received the following comments from Education Stakeholders regarding the establishment of a Performance-Based Teacher License prior to the Administrative Procedures Act (APA) deadline.**

**From:** Lela Hale <l lashale@yahoo.com>  
**Sent:** Friday, June 16, 2023 11:26 PM  
**To:** Licensure <licensure@mdek12.org>  
**Cc:** TeacherSupport <TeacherSupport@mdek12.org>  
**Subject:** Performance-Based Teacher License APA

Dr. Cory Murphy,  
Please consider the comments about the Performance-Based Teacher License. I respect all that you do for our students and teachers.  
Warmly,  
Lela Hale, Ph.D.

953 Temperance Hill Circle  
Potts Camp, MS 38659  
[lelashale@yahoo.com](mailto:lelashale@yahoo.com)

June 14, 2023

Dear Dr. Cory Murphy and the State Board of Education members:

I am writing concerning the upcoming proposal for the Performance-Based Teacher License (PBTTL). Having read the proposal, I have several concerns. I am speaking from my 31 years as an educator in Mississippi's public schools with the last 3 as a superintendent of a school district and having worked with undergraduate and Alternative route teacher interns for almost 10 years. From a superintendent's point of view, I understand trying to fill the teaching positions, especially in a school district that not everyone is flogging others to get there. I know the frustrations of not being able to find teachers and having students take online classes. While the stakes are high in meeting accreditation standards and the responsibility of providing a quality education for our students is an even greater part of an educator's stewardship, I'm writing to you to express what I genuinely find concerning. I want you to know I am trying to understand and not be nitpicky about the document.

Not all school districts are created equally, which is obvious by the various district A-F ratings. Having taught in Sunflower, Union, and Marshall counties, I realize some districts have more resources and support than others. As a graduate teacher over interns in the Delta up to the Tennessee state line, I do not believe we can expect all districts to have the same level of expertise to determine whether a teacher candidate meets requirements that others have accomplished by earning a teacher education degree. Furthermore, who in that school district will be qualified to determine if a teacher candidate meets all the requirements? Concerning candidate requirements, I did not see a grade-point average required for the subject area or overall grades on the transcripts, such as the C or above used by educational institutions. For clarity, are the PBLT candidates only in grades 5-8 and only for subject areas within the Mississippi Academic Assessment Program (MAAP)? I understand you can track progress if the grades/subjects are defined. Will the district assurance of *previous positive student learning impact on existing pre-/post assessments offered in the district* be those used from programs, for example, Mastery Connect, or will they only be state tests? If it is only state assessments, that will take at least two years for teachers to prove the positive impact. If candidates are allowed above grade 8 in any subject, that would be much harder for a district to prove their growth.

While experience is valuable, there is a big difference between a job and a teaching career. A person who has a job as a long-term substitute, emergency, special non-renewable license teacher, or licensed out-of-content teacher would still need to be trained professionally at a college or university. I do not understand what duties would constitute them to become a teacher with just 3 years of teaching experience and no formal teacher training. That is part of being a professional. Most substitutes or other non-licensed personnel that I know did not



attend professional development workshops unless it was mandatory, learn new skills, or write their own lesson plans, even the long-term substitutes. Most do not even know how to write a lesson plan. In my experience, teachers who do not know rely on how they were educated. For instance, many will ask students to write a sentence using a vocabulary word, which is about the least effective way to infuse new vocabulary in the minds of students. That's what they did in school! If they do not know what effective tools, strategies, and activities (emphasized at the university level) to include in lesson planning, they cannot write effective plans. I believe lesson planning has been one of the top fears of any teacher intern, whether they are an undergraduate or a teacher with a 3-year license in an alternate route program. To be honest, most do not understand, at first, Bloom's Taxonomy, differentiation, accommodations/modifications/IEPs, appropriate and sequential teaching procedures using different teaching strategies, developing varied assessments, infusing technology, fostering appropriate student behavior, and using family/community resources to impact student learning. Teacher candidates must plan, practice, teach, revise, and do all those things again. I have met some administrators who can help in that area, but they are not the majority. The Teacher Intern Assessment Instrument (TIAI) rubric provided by the MS Department of Education is awesome, but daunting for new teachers. Having experience in assisting teachers in using the TIAI, so many teacher interns have thanked me afterwards for providing the support to get them through the various components. Most did not realize what needed to be included. I always emphasize that the instrument is what is expected by the MDE to write successful lessons to increase student learning. Teachers and students can be successful, but only if they have the tools and know how to do so. In my opinion, the coursework of classroom management, tests and measurements, meeting the needs of special needs students, and the internships needs to be connected with the college/university level to ensure a teacher candidate truly gets the support he or she needs. If not, at least include the TIAI for districts to use to ensure the candidate knows what is expected in a unit with lesson plans. At least you know from the scores that the candidate has written plans and been observed by someone in the district.

I understand more about an assistant teacher having 6 or more years attaining a license; however, there are a few things that you should consider. An assistant teacher does not have the same duties or supervision of students as a teacher. Although I did have two teacher assistants attend a college at night and summers to attain their teaching degrees, neither took on the role of disciplinarian, planning lessons/units (which are not only demanding, but extensive), creating assessments, averaging/submitting final grades, or meeting with parents, especially those who had special needs. Just because the assistant has been in the classroom does not mean they have received the total experience of being a teacher, nor do they know the psychology or child development to help them understand why students do the things they do. Most assistants did not want those responsibilities and were glad to leave everything at school; others taught classes and done so quite well. Again, I feel that anyone with a 4-year degree not in teaching needs the support of a supervisor outside of the school district to assist him or her in becoming a qualified teacher.

I did not see a Praxis requirement. I understand that performance-based teaching experience could forgo the Praxis Core, but not the content area. The 3.00 on the Professional Growth System should be used as it is now for teacher performance once they have become a teacher, not for licensing. Requirements for converting to a Five-Year Performance-Based Teacher License could be strengthened if a content-area Praxis score was included to demonstrate he or she knows the pedagogy. I did see where additional endorsements may be added to the PBTl by way of the acceptable coursework credit hours option or obtaining a qualifying passing score on an MDE-approved licensure subject assessment shall be requested by the candidate only like any other teacher with a license.

Additionally, I understand that the MDE would rather not monitor professional development opportunities as aligned to the area of endorsement, but it would be nice for the MDE to have targeted choices of professional learning experiences from which to choose versus the school district assurance. What happens if the district does not provide the assurances? At least candidates could be earning credit and tracked through the MDE's system of its extensive professional development that is already on the website.

I don't understand why the Three-Year Performance-Based Teacher License is non-renewable but may be converted at any time during the three (3) year period once all requirements are met for the Five-Year Performance-Based Teacher License. Would you not wait until the 3 years were almost over and let them apply the last semester? If the 3-year license is converted prior to the end of the three years, what will keep him or her from going to another district once he or she attains a 5-year license?

In closing, I have a few thoughts to consider. The program would be stronger by requiring a transcript grade-point average of a C or above, the content-area Praxis to demonstrate content knowledge, the Teacher Intern Assessment Instrument for lesson planning, professional development by the MDE, and university supervision and targeted coursework. I believe trained professionals who are familiar with the TIAI should observe and support teacher candidates for them to attain a license. I do wonder how other professionals will accept candidates as validated when the candidate has taken no university course or Praxis assessments? How does this affect the teacher education programs, which require Praxis scores and grade point averages? My prayer is for all students to attain a high-quality education taught by highly educated professionals.

Warmly and concerned,

Lela Hale, Ph.D.

**The Office of Teaching and Leading received the following regarding the establishment of a Performance-Based Teacher License following the Administrative Procedures Act (APA) deadline.**

**From:** Joviladra Blake (via Google Docs) <drive-shares-noreply@google.com>  
**To:** "jovilblake@yahoo.com" <jovilblake@yahoo.com>  
**Cc:** "cmurphy@mdek.12.org" <cmurphy@mdek.12.org>  
**Sent:** Saturday, June 17, 2023 at 04:52:09 PM CDT  
**Subject:** Public Comment\_PBL\_Joviladra Blake\_2023June17

To: Dr. Cory Murphy, Associate State Superintendent  
Mr. Gen East, Chair of the Mississippi State Board of Education  
From: Joviladra Blake, Teach Plus MS Policy Fellow (Clarksdale Municipal School District)  
Re: Performance-Based Licensure Pathway  
Date: Saturday, June 17, 2023

I have been an 8th Grade Special Education teacher in the Clarksdale Municipal School District since 2019. Based on my 11 years of teaching experience as a GED teacher, the district took a chance with me. I had entered an alternate route program prior to being hired, Teach Mississippi Institute. As I prepared to take Praxis Core while teaching in the district, COVID happened, and I was granted the opportunity to have Praxis core waived through the alternate route program- my pathway to teaching. I currently hold a five year renewable license in Mild/Moderate Special Education, 7-12 English, and 7-12 Speech Communication.

When it comes to preparing me for the classroom, the content of the Praxis Core was nothing compared to the experience that I received from my actual classroom experience while on my one year emergency license. My gratitude to the district who saw the potential in me without a passing testing score is what gave me the drive that I really needed to become the best teacher I could be.

I will be going into my fifth year of teaching this Fall, and will serve as a Lead Teacher at Higgins Middle School. I am a candidate for National Board Certification and will graduate with my Master's degree in Education in March 2024. I know that this was only possible because I am finally pursuing my purpose. I not only want to make my students proud, but I also want to make the district personnel who saw the potential in me proud as well.

The requirements for the Performance- Based License are not much different than the current pathways that include testing requirements. The documentation of verifying at least three years lead teaching experience or six years of classroom experience in an accredited public or private school would grant many teachers the opportunity to become more effective teachers. A test could not see my potential nor my passion. It was my background of teaching, my passion, my drive, and my resilience that got me to where I am today. There are many other educators out there who have the same drive to teach, but have also faced the same obstacles to earning their license. The Performance-Based Licensure pathway will give them an opportunity to prove their effectiveness in the classroom.

From: Fredrick Robinson <[fredrickrobinson@qcsd.k12.ms.us](mailto:fredrickrobinson@qcsd.k12.ms.us)>  
Sent: Saturday, June 17, 2023 5:13 PM  
To: Cory Murphy <[cmurphy@mdek12.org](mailto:cmurphy@mdek12.org)>  
Subject: PBL

Good evening Dr. Murphy,

I am Fredrick Robinson, Superintendent of Quitman County School District. I write this message in support of PBL. PBL helped the Quitman County School District to alleviate some of the challenges caused by the teacher shortage and recruiting teachers to the Mississippi Delta. Our PBL teachers performed the same or better than teachers who obtained certification through the traditional route. I strongly liked the continuation of the PBL program.

Sent from my iPhone