JOSH GREEN, M.D. GOVERNOR



KEITH T. HAYASHI SUPERINTENDENT

STATE OF HAWAI'I DEPARTMENT OF EDUCATION KA 'OIHANA HO'ONA'AUAO KAIMILOA ELEMENTARY SCHOOL 91-1028 KAUNOLU STREET EWA BEACH, HAWAI'I 96706

May 19, 2023

Subject: Testimony (Comment on NBI 22-102 – Student Teaching Policy Regarding Teach For America Candidates)

Dear Hawai'i Teacher Standards Board Members,

Please allow me a moment to share why I feel strongly that Teach for America (TFA) should be allowed to prepare Special Education Teachers for licensure. Ka'imiloa Elementary School, like many other schools, regularly faces shortages of qualified teachers and the field of Special Education is especially difficult to fill. Our school is on the border of Waianae Coast which makes it even harder to recruit and retain teachers when they have the option of driving an additional 10 minutes to qualify for an \$8,000 annual bonus on top of their SPED bonus.

I have been at Ka'imiloa for three years and during this time I have hired three TFA teachers for Special Education positions and am already in agreement to hire one more for next school year. The majority of our Special Education students are in inclusion and resource settings. This means that these students are engaging in the same curriculum as the general education students. In order to ensure content and rigor is aligned within our Grade Levels, our Special and General Education Teachers work in close partnership daily, meet as a Grade Level for weekly Articulation, receive support from our Full Release Grade Level and Special Education Coaches, and regularly participate in school wide professional development.

At Ka'imiloa, inclusion teachers teach in the general education setting that is inclusive of both students with disabilities and their non-disabled peers. Inclusion teachers understand and utilize the grade level standards and the general education curriculum daily. Deep knowledge and skill are necessary for teachers serving in an inclusion role because they are expected to plan thoughtfully so that all instruction can be adapted to address the diverse needs of the classroom. Ka'imiloa inclusion classrooms utilize both teachers' expertise and on any given day for any given lesson it could be the general or special education teacher taking the lead.

As TFA teachers are new to the profession they are on the Educator's Effectiveness System cycle which means they have a minimum of two formal observations per year. In addition to formal observations for teachers on cycle, all teachers receive informal observations via campus walkthroughs. Our TFA teachers are also observed by their TFA mentors as well as District assigned Induction and Mentoring mentors. The formal and informal observations in addition to their regular teaching responsibilities far surpass the amount of clinical hours that student teachers receive.

I appreciate your time and hope that reconsideration can be made for allowing TFA to license Special Education Teachers. TFA has always demonstrated flexibility and responsiveness and I am confident they will adjust to concerns that have been raised. This is a crucial time for the Department to build momentum toward our State Strategic Goals and I feel that this would be a step in the wrong direction for our system if it was not allowed to continue and evolve. If you would like more information please feel free to reach out to me via email at <u>Anela.Pia@k12.hi.us</u>.

Thank you,

Aucha ter

Anela Pia Principal

REGIONAL OFFICE

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May 20, 2023

Hawai'i Teacher Standards Board 650 Iwilei Road, Suite 268 Honolulu, HI 96817



Re: General Business Meeting Agenda Item IV.A. NBI 22-102 Student Teaching Policy Regarding Teach For America Candidates

Aloha Chair Kawazoe and Members of the Board,

Teach For America (TFA) respectfully submits that the TFA 2022-2023 teacher candidates listed in Exhibit A have completed their supervised clinical experience in student teaching in a Hawai'i public school at the appropriate grade level and in the subject for which they are seeking a license, in full compliance with the requirements articulated in <u>NBI 12-27 revised</u> and <u>11-03 revised</u>. We strongly urge the Hawai'i Teacher Standards Board (HTSB) to approve and issue licenses to these teachers once they complete TFA Hawai'i's alternative certification program and are formally recommended.

Brief Background

Teach For America Hawai'i's Alternative Route to Certification program (ARC) has been a nationally accredited, state approved teacher education program since 2012. All TFA teachers pursuing licensure through TFA's ARC program work toward a license in the subject of elementary or a secondary content area. All candidates take and pass their Praxis exams in the applicable subject, take aligned subject area coursework with one of our university partners, and engage in subject area communities related to their licensure fields. Principals hire TFA teachers in teaching positions where they fulfill the clinical hour requirement of teaching 450 hours in the subject they are seeking a license. While many schools have TFA teachers support students who are eligible for Special Education (SPED) services, TFA teachers complete their student teaching experience in settings where they are gaining experience teaching a subject, often co-teaching in inclusion settings. These teachers use curriculum and standards that are the same or similar to those used for general education. They provide SPED services in addition to, and not in lieu of, teaching a subject area content. TFA and the Hawai'i Department of Education (HIDOE) have, at all times, been open and transparent that TFA teachers are hired in both general education and Special Education lines. Notably, for the past decade, HTSB has approved and issued licenses to TFA teachers in the subject area they completed their student teaching, whether they taught in a general education or Special Education teaching position.

On Friday, April 21, 2023 at 6pm, TFA received a letter from Chair Kawazoe expressing concern for the first time about TFA candidates in Special Education teaching lines and requesting that TFA "address how each teacher candidate met the requirement for their recommended licensure field while in a Special Education setting." On April 27, 2023, four business days later, TFA provided a response which included letters from the eight principals of teacher candidates listed in Chair Kawazoe's letter. As requested, each principal verified that the TFA candidates were



Hawai'i

teaching in subject matter license fields using general education curriculum and standards and surpassed the 450 hours of clinical teaching experience (See Exhibit B).

On May 16, 2023, TFA was notified of the public hearing scheduled for May 23, 2023 and the New Business Item 22-102. TFA respectfully notes that there are inaccuracies and errors in the findings. Nonetheless, TFA appreciates that HTSB has affirmed that it will issue licenses to TFA 2022-23 teacher candidates upon completion of supervised clinical experience in student teaching in the subject or role for which they are seeking a license. TFA strongly urges that HTSB find that the evidence previously submitted by principals, along with the testimony provided below and by a considerable magnitude of teachers, principals, and stakeholders in the broader community, be deemed more than adequate evidence of completion of supervised clinical experience requirements.

1. TFA teachers who completed their supervised clinical experience in Special Education teaching lines have met the requirement of teaching in the subject for which they are seeking licensure

According to NBI 12-27 revised, in order to meet the requirements of supervised clinical experience, candidates must complete "student teaching, internship, or residency in a Hawai'i public, charter, or private school at the appropriate grade level(s) and in the subjects or school roles (e.g., school counselor, school librarian) for which they are seeking a license." As previously shared, principals have verified that the TFA candidates teaching in SPED lines have met each of these requirements (See Exhibit B). The principal verification letters clearly confirm each required component was met by naming: the Hawai'i public school, grade level, subject/license field, and school role of teacher, and affirm that the teachers have surpassed the 450 hours of clinical teaching experience in the license field noted. (Id.) Principals further confirmed that candidates teaching in SPED lines use curriculum and standards similar to those in general education settings. (Id.)

Based on what is bolded in NBI 22-102, we infer that HTSB may be questioning whether teachers in SPED lines are teaching in the "subject" or "school role" for which they are seeking a license. With respect to "subject," we stand firm in our conviction that Special Education is not a "subject". Special Education teachers teach grade-level subjects while also working to provide accommodations to meet the needs of diverse students. We acknowledge that there may be circumstances where students with severe disabilities may be in classroom settings that focus on life skills. However, TFA teacher candidates do not teach in these settings. TFA candidates are hired in mild/moderate teaching lines where they do, in fact, teach subject area content, as confirmed by principals (See Exhibit B). With respect to "role," we are not aware of a HTSB definition or articulated categories for "role" beyond the examples provided in the NBI of "school counselor" and "school librarian." As such, we respectfully submit that it is unclear what constitutes a "school role." However, we can attest that no TFA candidate is improperly in the role of counselor or librarian. All TFA candidates are hired in the role of full-time teachers, which is also verified by principals. (Id.) Finally and importantly, the language of NBI 12-27 revised says subject or school role. While we believe that TFA candidates have met both requirements, so long as HTSB finds that there is sufficient evidence of one - i.e., that the candidate is teaching in *either subject* or school role – that they seek a license, the evidence meets the requirement as stated in the plain language of the policy. In this case, TFA candidates clearly meet the requirement of teaching in the subject they are seeking a license.

2. TFA teachers who were hired in Special Education lines have received training and support by both TFA and HIDOE and are qualified, effective educators deserving of their license.

Beyond the plain language of the policy, we presume that HTSB deeply cares about the quality and effectiveness of the educators that are being issued licenses. We respectfully submit that TFA teacher candidates who were hired in Special Education lines have received training and support and are qualified, effective educators.

As discussed above, as part of TFA's ARC requirements, all teacher candidates must complete a rigorous training program in the subject/content area they are seeking a license, including but not limited to, passing the aligned subject Praxis, taking university coursework in the aligned subject, and participating in ARC content learning





communities. In addition, all teacher candidates have coursework and professional development related to exceptional students, students with disabilities, and individualized education programs (IEPs). Teachers in SPED lines also have the support of a SPED specialist.

Beyond the support provided by TFA, teachers in SPED lines receive additional training, support, and supervision at school sites. Many attend SPED department meetings, conference with SPED course alike leads, and complete additional training on IDEA compliance, in addition to receiving individualized support and development from both TFA and HIDOE.

We disagree with the implication that TFA candidates do not receive adequate support or training in Special Education practices and laws. However, we do agree that more support for teachers in SPED lines would be beneficial and we are committed to continuing to provide increased access to resources and support for this important work. Notwithstanding that "more" is always "better," we are extremely proud that our Special Education teachers - like our General Education teachers - continue to be rated strongly on their performance evaluation. Over the duration of our program, 90% of TFA candidates, including SPED teachers, have been rated proficient or distinguished by their evaluators, and principals continue to hire TFA candidates into these important positions.

3. To the extent that the Board believes that new policies should be adopted, any changes should be made on a prospective basis only to avoid prejudicing those teachers who have reasonably relied on the existing language and past practice of HTSB.

We believe that TFA's ARC program responsibly meets the requirements of HSTB while contributing an important pipeline of effective teachers for high-need SPED positions and humbly request that HTSB find that SPED teachers who teach a subject/content area may be licensed in the subject/content area they are teaching.

Should HTSB choose to adopt new policies and/or revise the existing policy to prevent SPED teachers from being licensed in the subject that they are teaching, we strongly urge HTSB to do so on a prospective basis only. TFA candidates who are completing their program in the 2022-23 school year have reasonably relied on the policy as it has been interpreted by HTSB for the past 10 years. To change the policy now - after teachers have worked tirelessly all year to complete program requirements that a year ago would have allowed them to be certified - is not fair to these teachers and not in the best interest of students or schools. Denial or delay of licensure would cause these teachers to lose out on thousands of dollars in future compensation that is so needed for financial sustainability in Hawai'i. It would also necessitate that they change teaching positions next year to general education lines, which schools have not planned for and may not be able to accommodate. This further leaves schools with more open Special Education positions, when schools are already facing an extreme shortage of Special Education teachers. We understand that in the 2022-23 school year, the vacancy rate for Special Education teacher positions grew 2 percentage points to 7%.

TFA Special Education teachers have worked diligently around the clock to provide high quality, grade-level, content instruction to students they care deeply about, while completing rigorous requirements of our ARC program and University coursework. We urge you to timely issue their licenses when we formally recommend them in June.

Additional Background

Teach For America has proudly partnered with the HIDOE since 2006 to advance educational equity by recruiting, training, and developing teachers and leaders who work to positively impact historically under-resourced schools and systems. In that time, over 900 TFA teachers have been hired by principals in the HIDOE, including over 350 teachers who have helped to fill a critical need as teachers and care coordinators for SPED students in over 50 public schools across Hawai'i. In addition to directly impacting students in the classroom, many TFA teachers, including SPED teachers, take on leadership and mentorship roles in schools (e.g., at Campbell High School, TFA teachers held the SPED Department Head role for 9 of 10 years from 2011-2022), in the district offices (e.g., held the position of District Education Specialist in SPED for West Hawai'i), and in TFA's credential program (e.g., currently



works part-time as a TFA SPED mentor for new TFA SPED teachers, as well as serves as the School Services Coordinator at Lehua Elementary).

Teach For America Hawai'i's alternative certification program is a nationally accredited, state approved teacher education program. As part of the re-accreditation process, TFA had the pleasure of hosting the Association for Advancing Quality and Educator Preparation ("AAQEP")'s quality review team in Hawai'i in January 2023. The quality review team met with current program candidates, program completers, school principals, community partners, and TFA staff and board members. On April 14, 2023, the Accreditation Commission of AAQEP discussed and deliberated on TFA's program and unanimously concluded: "Based on examination of the case record, including the Quality Assurance Report and the Quality Review Team Report, the AAQEP Accreditation Commission awards accreditation for a full term of 7 years to the initial licensure programs of Teach For America - Hawai'i" (See Exhibit C). No concerns or conditions were noted.

Teach For America shares the Hawai'i Teacher Standards Boards resolve and commitment to ensuring classrooms in Hawai'i are filled with committed, compassionate, and effective educators. We urge you to issue licenses to all our teacher candidates who complete our rigorous program in June, including and especially, those who have worked tirelessly all year to ensure students with special needs have equitable access to rigorous grade level content.

Respectfully,

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Jill Baldemor Executive Director Teach For America Hawai'i

Jeff Arce Regional Board, Chair Teach For America Hawai'i

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H. Mitch D'Olier Regional Board, Chair Emeritus Teach For America Hawai'i



Exhibit A: TFA 2022-2023 Teacher Candidates

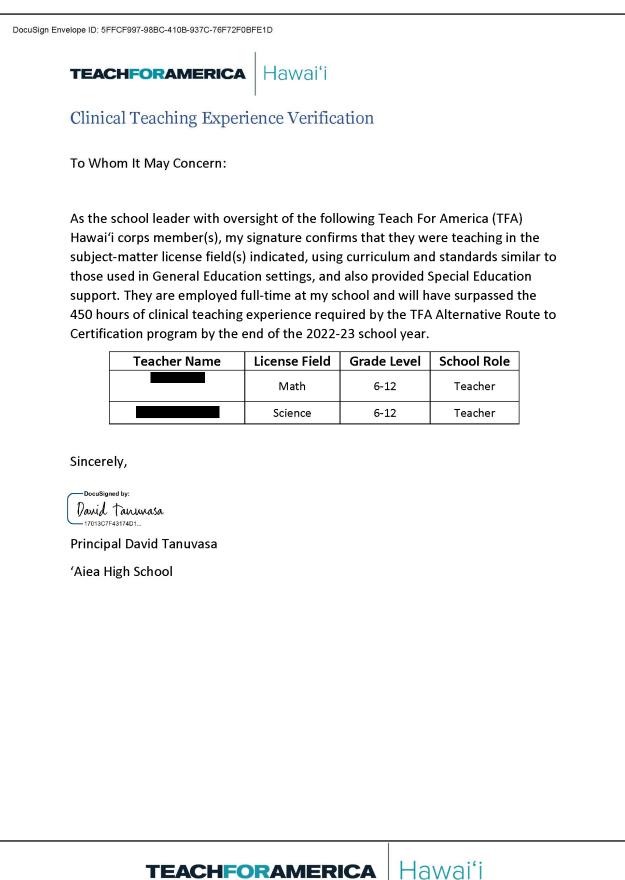
NAME	License Recommendation (Field and Grade Levels)
	Elementary K-6
	English 6-12
	Math 6-12
	English 6-12
	English 6-12
	Math 6-8
	Science 6-12
	Elementary K-6
	Social Studies 6-12
	English 6-12
	Elementary K-6
	Elementary K-6
	English 6-12
	Elementary K-6
	Elementary K-6
	English 6-12
	Elementary K-6
	Science 6-12
	Elementary K-6
	English 6-12
	Math 6-12
	Math 6-12
	English 6-12
	Math 6-12
	English 6-12
	Elementary K-6
	Elementary K-6
	English 6-12
	Math 6-12
	Elementary K-6
	English 6-12
	Elementary K-6
	English 6-12
	Science 6-12
	Math 6-12
	English 6-12

NAME	License Recommendation (Field and Grade Levels)
	English 6-12
	Math 6-12
	Science 6-12
	Science 6-12
	Elementary K-6
	Social Studies 6-12
	Math 6-12
	Science 6-12
	Math 6-12
	English 6-12
	Elementary K-6
	Elementary K-6
	Elementary K-6
	English 6-12
	Elementary K-6
	Social Studies 6-12
	Elementary K-6
	Science 6-12
	Math 6-12
	Elementary K-6
	Social Studies 6-12
	Math 6-12
	Social Studies 6-12
	Elementary K-6
	Elementary K-6
	Science 6-12
	Social Studies 6-12
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	Math 6-12
	Science 6-12
	English 6-12
	Science 6-12
	English 6-12



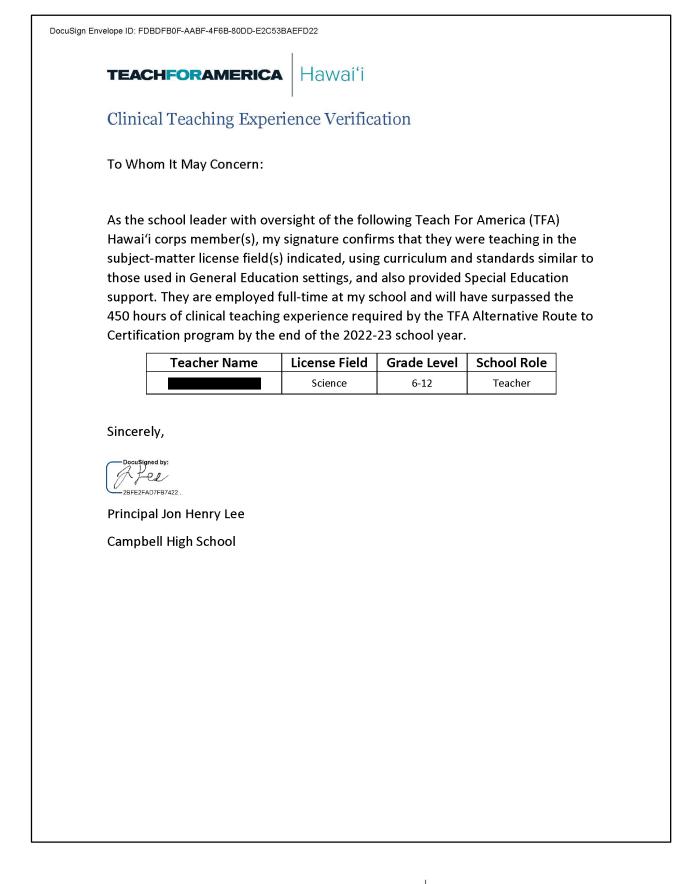
Exhibit B: Principal Verification Letters

B1. 'Aiea High School, Principal David Tanuvasa

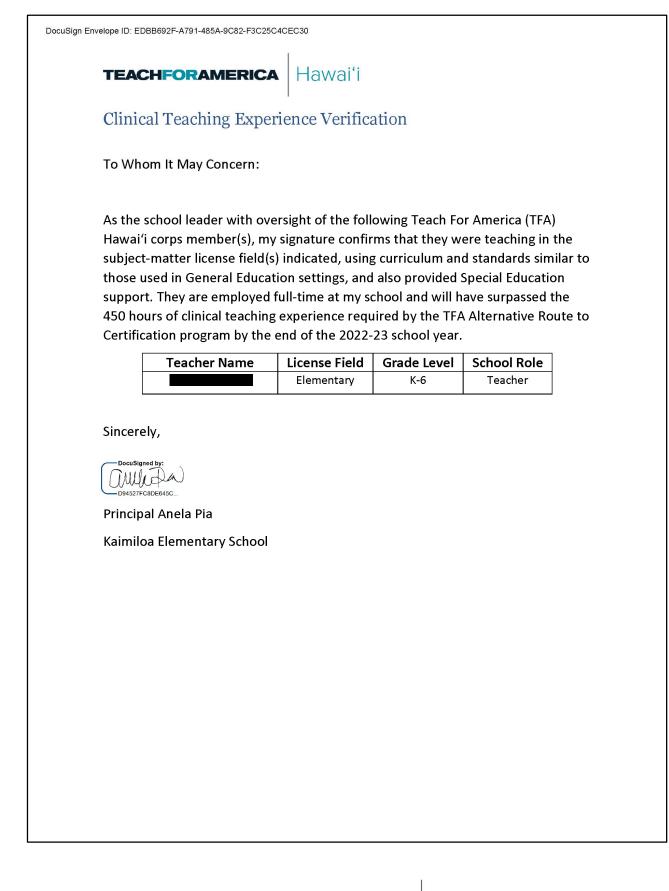


TEACHFORAMERICA

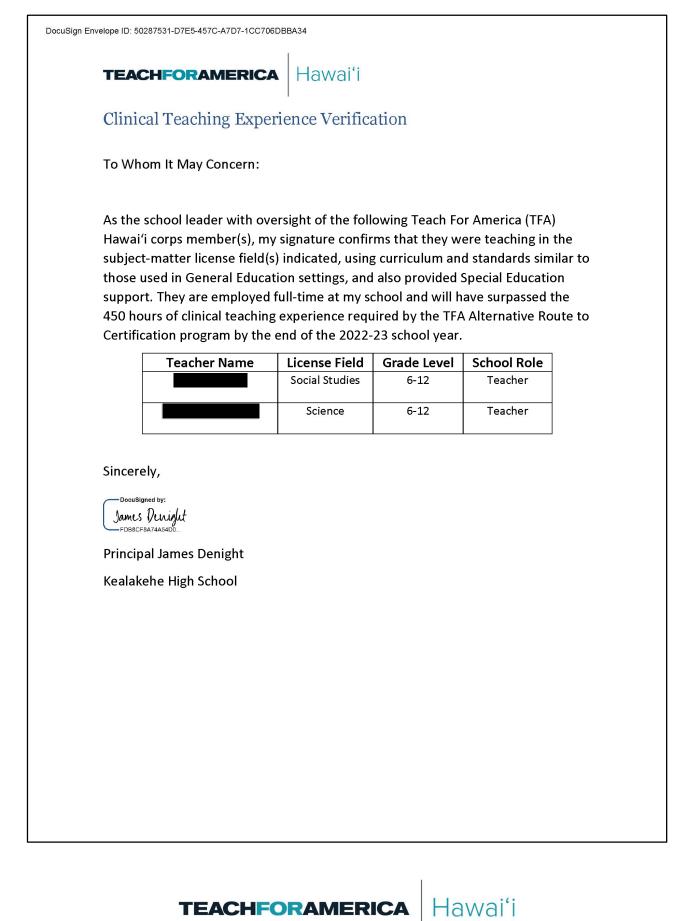
B2. Campbell High School, Principal Jon Henry Lee



B3. Kaimiloa Elementary School, Principal Anela Pia

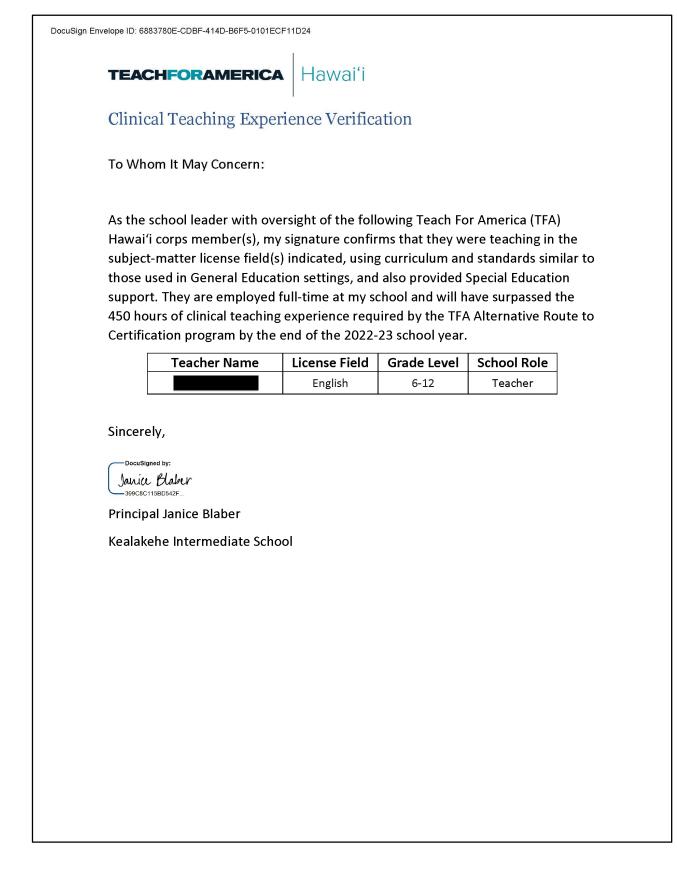


B4. Kealakehe High School, Principal James Denight

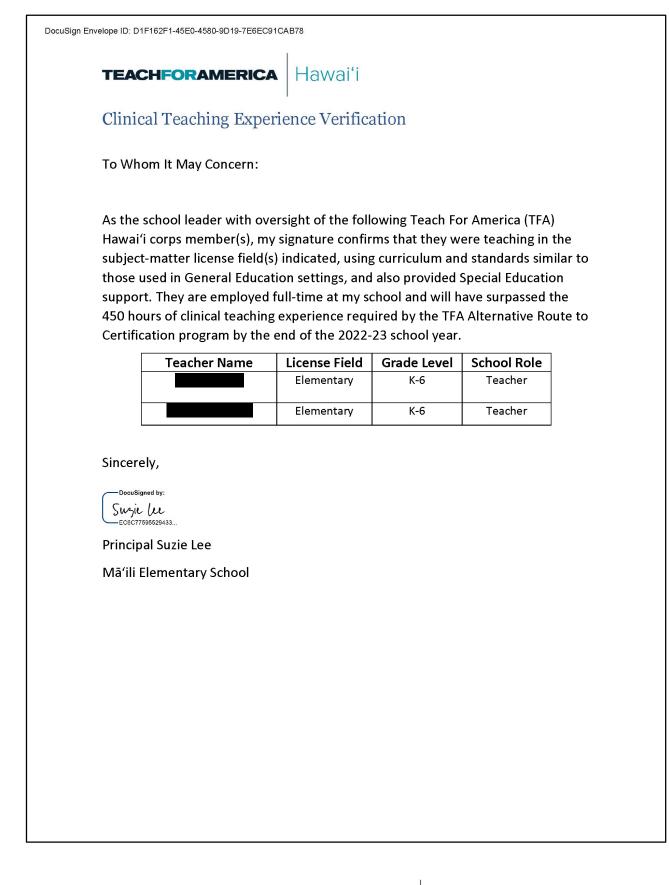


One day, all children in this nation will have the opportunity to obtain an excellent education.

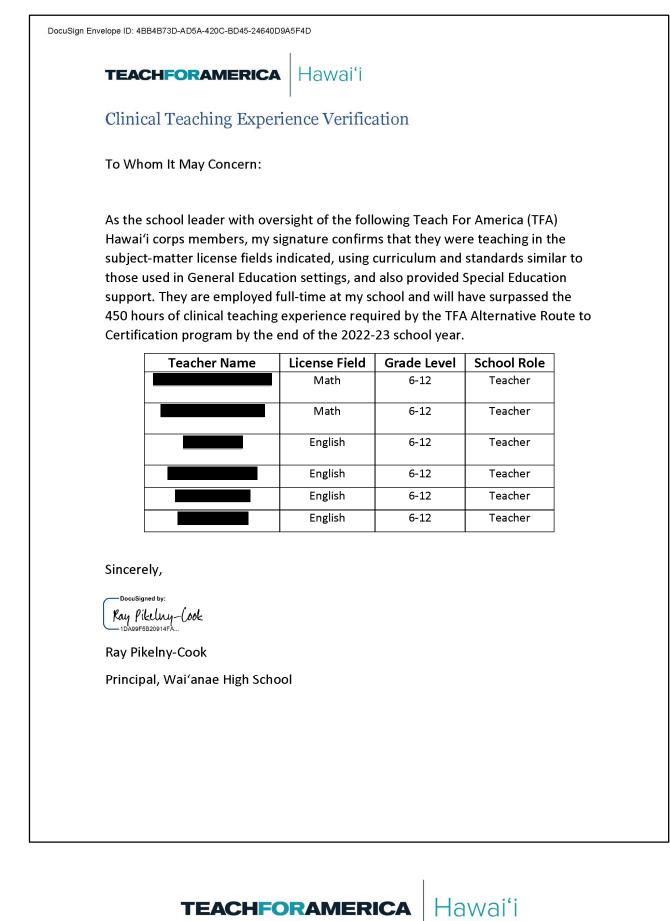
B5. Kealakehe Intermediate School, Principal Janice Blaber



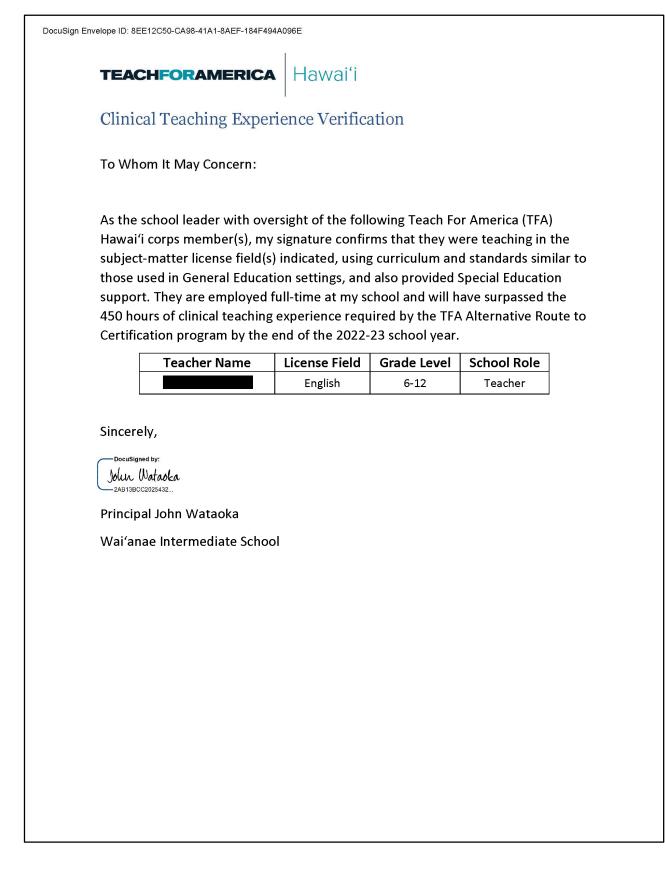
B6. Mā'ili Elementary School, Principal Suzie Lee



B7. Wai'anae High School, Principal Ray Pikelny-Cook



B8. Wai'anae Intermediate School, Principal John Wataoka





May 11, 2023

Jill Baldemor Esq. Executive Director Teach For America - Hawaii

Dear Ms. Baldemor:

This letter serves as formal notification of action taken regarding initial licensure programs of Teach For America - Hawaii by the Accreditation Commission of the Association for Advancing Quality in Educator Preparation at its meeting on April 14, 2023.

Action: Based on examination of the case record, including the Quality Assurance Report and the Quality Review Team Report, the AAQEP Accreditation Commission awards accreditation for a full term of 7 years to the initial licensure programs of Teach For America - Hawaii.

This action is effective immediately and extends **through June 30**, **2030**, or until Teach For America - Hawaii ceases to be a member in good standing of AAQEP, whichever is earlier. Annual Reports are due by December 31 of each year, with the first report being due December 31, 2024. In addition, please refer to our <u>substantive change policy</u> for guidance on program changes that must be reported.

Congratulations!

Mark La Celle Heters

Mark LaCelle-Peterson, Ed.D. President and CEO

Pres	sident and CEO
CC:	Alyson Emrick, Director, TFA-Hawaii Licensure and Regional Team Initiatives

AAQEP – Always improving together



[EXTERNAL] Testimony

Trever Asam <tasam@cades.com> Sat 5/20/2023 2:21 PM To: HTSB <htsb@hawaii.gov> Name: Trever Asam Meeting: General Business Meeting May 23, 2023 Agenda Item: NBI 22-102, Student Teaching Policy Regarding Teach For America Candidates Position: Comment

Aloha.

I am currently an attorney in private practice. But before beginning this career, I was a public school teacher, teaching seventh and eighth grade social studies. My first year of teaching was a swirl of emotion, fatigue, learning, challenge, and joy. I remember watching my students' eyes light up as they mastered concepts; I remember conversations with parents about their children and their direction. And in the middle of all of the other tasks in front of me, I remember working to obtain my teaching license. This involved night-school classes, as well as working to ensure that all of the appropriate boxes were checked and requirements satisfied. It wasn't easy. The requirements weren't always clear and the instructions were sometimes contradictory. To navigate the system, I relied on my principal, my teacher coach, and the union. They, in turn, relied on their experiences over the prior decade of assisting others in this journey.

My experience brings me here today to support teachers who face similar challenges.

These teachers – all of who are special education teachers – have fulfilled all requirements that have been asked of them as both teachers and license applicants. They have taught in some of the State's most difficult placements, caring for and supporting their students while standing tall for their school communities. In support of their licenses, they have taken classes at night and on the weekends. They have endured the stresses that only a classroom teacher knows. And—following the advice of their principals, coaches, and advisors—they have navigated the licensure requirements, including the clinical hours requirement.

I understand that the Board is now re-evaluating the interpretation of the clinical hours requirement with respect to special education teachers. In order to be fair to those teachers who have spent the year working towards the requirements, it is necessary that any changes be made only prospectively. Any attempt to change the rules now – and apply that change to these special education teachers – will harm dedicated individuals who have spent the entire year following the guidance that everyone has given to them. These teachers have had no notice of a pending change, nor do they have any opportunity at this point in the year to make up the hours that would be lost. These teachers have followed the rules; you cannot change the rules at this point in the year.

Changing the rules now also harms their principals, who have worked with these teachers all year – under rules they believed to be settled – only to have their teachers fall short of licensure. And ultimately, changing these rules now will harm the students, whose teachers will remain underpaid and underappreciated.

Changing the rules now moves the goalposts on our teachers, just as they are nearing the end-zone. This is not the way to treat teachers and in particular it is not the way to treat special education teachers.

Thank you for your consideration,

Trever K. Asam | Partner | Cades Schutte LLP

Cades Schutte Building | 1000 Bishop Street, Suite 1200 | Honolulu, HI 96813 **Phone:** 808.521.9274 | **Fax:** 808.540.5023 | **Web:** cades.com | **Email:** <u>tasam@cades.com</u>



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HOUSE OF REPRESENTATIVES

Hale o nā Luna Maka'āinana

STATE OF HAWAI'I STATE CAPITOL 415 SOUTH BERETANIA STREET HONOLULU, HAWAI'I 96813

Aloha e Chair and Members of the Hawaii Teacher Standards Board,

I am writing as the State House representative for HD 46, which includes five schools that have TFA Corp members placed in Special Education positions. All told, there are forty-seven TFA Corp members who have been placed in Special Education positions in Title I schools across Oahu and Moku o Keawe this year, but the placements dating back to 2013 number in the hundreds. I am deeply concerned that current practices regarding teacher preparation and practicum placement that have been allowed to obtain in Hawai'i since at least 2013 are in violation of federal law and contrary to the interests of our students with special needs.

The Individuals with Disabilities Act (IDEA) law specifically addresses the issue of classroom teachers not certified in Special Education. This is permissible only "if the teacher is participating in an alternate route to special education certification program." TFA does not have an approved program in Special Education, so their teacher candidates are out of compliance because they are not participating in an alternative route to special education certification. As long as this is true, Teach For America Corp members should not be able to be hired in Special Education settings.

The state has invested tens of millions of dollars since the early 2000s in this failed model of teacher recruitment, with the short service time (two years) contributing to constant churn and instability in our public schools, especially in our hardest to staff Title I schools. While there may be a few exceptions to the rule of rapid turnover, the overall pattern does a tremendous disservice to our children. And the parents of students with special needs will be livid when they discover that so many of their children's Special Education teachers were receiving no pedagogical instruction in their licensure process that could have helped them become more effective in working with their children.

Josh Heimowitz, Senior Managing Director External Network, in his efforts to mobilize opposition to holding TFA accountable for negligent practices, is keenly aware of the systemic dependency TFA has successfully created in Hawai'i. He extolls people in positions of public decision-making authority to submit testimony to remind you, the Board, that "TFA Special Education teachers are a critical pipeline of teachers for the HIDOE. There is a shortage of Special Education teachers in Hawai'i and schools have relied on TFA to help fill this hard to fill position. If unable to hire TFA teachers in SpED lines, this could have a detrimental impact on schools and students, many of whom would likely have to fill these positions with long-term substitute teachers."

That is a manufactured dependency, one that has been incredibly lucrative for TFA, a "nonprofit" that reported net assets of \$500 million in 2022. Our state's contract with TFA for the coming year perpetuates our dependency at the expense to the state of an additional \$1.6 million. This insanity needs to end. The HTSB is uniquely positioned to check and ultimately end our dependency on providers of shoddy, fly-by-night teacher preparation programs and failed teacher recruitment programs, and ensure that all of our students, especially the most vulnerable, are taught by highly qualified teachers. Our kids deserve better.

Mahalo. A Perrus Olugo