



**North Carolina Association of Colleges for Teacher Education**  
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October 1, 2022

To: PEPSC Commission Members

From: North Carolina Association of Colleges for Teacher Education (NCACTE)

Re: Current version of “Pathways” licensure proposal presented to PEPSC,  
September 8, 2022

The purpose of this communication is to share specific questions and concerns that NCACTE continues to have related to the current version of the “Pathways” licensure proposal. These questions reference the version shared at the September 8 PEPSC meeting ([Licensure Proposal PPT Presentation- PEPSC Sept 8](#)). While NCACTE continues to have concerns related to the overall model, this document focused on elements of licensure and preparation related to License Levels 1-3, which are the levels most directly related to teacher preparation.

On behalf of our membership, below we share summary observations of the most recent version of the model, followed by hypothetical examples of a teacher moving through the proposed model (Section A) and questions regarding License Levels 1-3 (Section B).

Summary observations: As noted in previous NCACTE communications, the most recent version of the Pathways proposal fails to elevate effective teacher preparation despite North Carolina-based research findings that EPP-prepared candidates have [higher retention rates](#) and [better student outcomes](#). When considering examples for individuals holding a bachelor’s degree who affiliate with Public School Units (PSUs) versus Education Preparation Programs (EPPs), the simpler path, or “path of least resistance,” clearly lies with PSU affiliation, as defined by this model. This proposed pathway persists despite additional evidence from other states that alternative preparation programs are not as effective in producing positive student outcomes as traditional university preparation programs. The most recent example is from Texas, where most teachers are alternatively certified. Key findings in a [2022 joint study on Teacher Preparation Paths](#) from Educate Texas and the University of Texas at Austin noted that over a nine-year period, 1) university-certified teachers had a 24% higher retention rate than alternatively certified teachers; 2) in every tested subject, students do better if they have university-certified teachers; and 3) for low-income students, having a university-certified teacher can offset half or more of the disadvantages that comes from living in poverty. In North Carolina, legislative mandates placed on EPPs, such as program entry requirements, combined with limited options for EPP completers to meet licensure level requirements as compared to PSU affiliators, seem to create inequitable barriers for EPPs

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in recruiting future candidates. Furthermore, little evidence exists that alternatively based teacher licensure programs lead to improved outcomes for learners. While North Carolina’s Educator Preparation Programs remain committed to producing highly effective and qualified teachers, we are unconvinced that this proposal will elevate EPP completion, increase the teacher pipeline with qualified candidates, or further diversify the educator pipeline, as has been claimed by proposal advocates.

**Section A: Examples - affiliating with PSU vs EPP**

Based on the current PEPSC proposal, these examples track through specific instances of how an individual who already holds a bachelor’s degree could progress through the proposed licensure model affiliated with a Public School Unit (PSU) vs an Educator Preparation Program (EPP). Example 1 shows possible licensure progression options if an individual with a bachelor’s degree affiliates with a PSU. Example 2 shows the progression if an individual affiliates with an EPP. **These examples show the clear differences in affiliation paths in terms of rigor and requirements.**

**Example 1 - Requirements for individual holding a bachelor’s degree who affiliates with PSU: possible options**

Sample teacher profile: Laura holds a Bachelor’s degree in computer science and is hired by a district to teach math and affiliates with her PSU for licensure. She has many options for licensure completion. If she chooses to work toward License 2 or 3, her minimum path could be as simple as completing the two boxes shaded in green for each category below:

Hired as License 1 teacher	To Become a License 2 teacher: NEED 1 OF THESE FOR PEDAGOGY AND 1 FOR CONTENT	To Become a License 3 teacher: NEED 1 OF THESE FOR PEDAGOGY AND 1 FOR CONTENT
Bachelor’s degree with 18 credit hours “related” content	Complete 1 microcredential “bundle” for “pedagogy” at basic level	Complete 1 microcredential “bundle” for “pedagogy” at intermediate level
	OR	OR
	Complete 1 microcredential “bundle” for “content” at basic level	Complete 1 microcredential “bundle” for “content” at intermediate level

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Hired as License 1 teacher	To Become a License 2 teacher: NEED 1 OF THESE FOR PEDAGOGY AND 1 FOR CONTENT	To Become a License 3 teacher: NEED 1 OF THESE FOR PEDAGOGY AND 1 FOR CONTENT
	OR	OR
	Principal Obs + Student Surveys OR	Principal Obs + Student Surveys OR
	Praxis II content exam - within 10 points below cut score OR	Praxis Content Exam - meet or exceed cut score OR
	edTPA/PPAT pedagogy exam - within 3 points of cut score	edTPA/PPAT pedagogy exam - meet or exceed cut score OR
		0+ EVAAS Growth for two most recent years
Max time: 2 (or 3) years	Max time: 2 years	Max time: 6 years

**Observations regarding PSU Affiliation:**

- **No required teacher educator training of any kind is required**, despite clear evidence that EPP training produces the best teachers in North Carolina AND evidence that alternative preparation in other states has not been as effective as traditional teacher preparation.
- All teacher “preparation” would fall wholly on the Public School Unit, including all vetting of pathway options and tracking requirements.
- There is currently no clear understanding of what microcredential “bundles” would look like, how they would be evaluated, what the rigor of the MCs would entail, etc. Again, this would fall to the PSU to monitor.
- This current model allows for repetition of multiple measures (is this the intention?)

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**In contrast, EPP affiliated teachers would have fewer options and more requirements.**

Sample teacher profile: Laura holds a Bachelor's degree in computer science and is hired by a district to teach math and affiliates with her EPP for licensure. She has fewer options for licensure completion and must meet more legislatively mandated requirements, as opposed only completing selected options if she had affiliated with a PSU. Her pathway to License 3 is shaded in green below:

**Example 2** - Requirements for an individual with a bachelor’s degree who affiliates with EPP.

Hired as License 1 teacher: <b>ALL REQUIRED</b>	To Become a License 2 teacher:	To Become a License 3 teacher: <b>ALL REQUIRED</b>
Bachelor’s degree with 18 credit hours “related” content	----->>> <b>Can skip directly to Level 3 upon program completion</b>	Must complete edTPA/PPAT (legislatively mandated)
2.7 GPA entry requirement (legislatively mandated)	Can EPP completers move to License 2 if they complete specific measures aligned with License 2? Assume so but that is not explicit.	Must complete a content knowledge measure (Praxis OR MC OR 0+EVAAS?)
Meet Core entry requirement (legislatively mandated)	<b>**Candidates are completing coursework while working full time as a teacher (unlike PSU affiliates)**</b>	Meet all coursework requirements
Meet any additional university entry requirements (IHEs)	EPPs must support based on MOU	Meet all program completion requirements (GPAs, etc.)
EPPs must support based on MOU		
Max time: 2 (or 3) years	Max time: 2 years	Max time: 6 years

**Observations regarding EPP Affiliation:**

- EPP affiliation is held to higher / different standards than PSU affiliation. While EPPs are designed to meet these higher requirements, these additional steps create inequities between the two affiliation options.

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- What motivation exists in this model for EPP completion with those who already hold a bachelor's license? The inherent requirements for EPP completion are more rigorous than those for PSU affiliation.
- While EPPs are required to establish MOUs with PSUs to support License 1 and 2 teachers, there is no reciprocal requirement for PSU to partner with EPPs for micro-credentials or other elements of PSU-affiliated preparation.
- If an EPP-affiliate is hired as a L1 teacher and then passes L2 measures (e.g., Praxis 2 as their content knowledge measure with a positive Principal + Student Survey evaluation), they could move away from EPP-affiliation completely. This option disincentives EPP completion.

### **Section B: Specific Questions for Licensure Levels 1-3**

#### License 1

1. What does it mean to be “affiliated with a PSU?” What are the expectations for the PSU in terms of teacher training? All districts do not have an approved EPP in place. It looks like someone can easily bypass an EPP/teacher training in this model. Is that the intention?
2. How will “relevant” content in License 1 be determined for various licensure areas?
3. What are the expectations for districts for ensuring that initial teachers who DO NOT affiliate with an EPP are being appropriately trained? We are not seeing anything in this model that shows how teachers will be trained. We can see how they will be evaluated.
4. We have some general language about the new teachers support program but that's it. **Is the New Teacher support program intended to be the training ground here? This feels like we are doubling down on alt prep.**
5. The License 1 teacher is described as “not the teacher of record” and is placed with a co-teacher, but only must teach/observe with that teacher for 1 hour per week. The License 1 teacher is observed by an Advanced teacher 5 hours per week.
  - a. What if no certified co-teachers are available?
  - b. With only 1 hour per week of “co-teaching,” isn't the License 1 person a “de facto” teacher of record?
6. EPP entry requirements are legislated at 2.7. What are the minimal GPA requirements to hire someone into a License 1 position? The current proposal puts EPPs at a disadvantage on recruiting.

#### License 2

1. Microcredentials: Can a person complete MCs with no formal “training” and move to the next level of licensure?

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2. Can microcredentials be repeated multiple times until they are passed? If so, how does this equate in rigor to university coursework?
3. If MC can meet requirements for content or pedagogy, then how does this impact the legislative requirement for edTPA/PPAT for EPPs? Seems unfair to force EPPs to implement edTPA/PPAT.
4. Can an EPP affiliated individual who meets requirements for License 2 be moved to that level while they are enrolled in an EPP?
5. Why would we accept evidence of a non-passing cut score as evidence of “basic” content or pedagogy knowledge on an exam? That doesn’t make much sense.
6. Language includes “support by the sponsor as defined in the MOU between the PSU and an EPP.” This implies that EPPs would be expected to support their candidates in PSUs in specific ways, yet the PSU has no expectations indicated here for training, etc Is the intention to place additional burdens on EPPs?

### License 3:

1. Please confirm that candidates could move from License 1 to License 3 (or clarify otherwise). That is not clear in the most recent version but was part of the original graphic for the model.
2. The EPP option requires program completion + edTPA/PPAT + content knowledge measure (test, MC, or other). Why are EPPs being held to a higher standard than other pathways? edTPA/PPAT is the only option for meeting certain requirements available to EPPs.
3. Approved EPP programs in NC already have components for content knowledge assessment and pedagogy assessment built into their programs. Most of these programs have either been reviewed by the state at some point OR have undergone accreditation reviews. These programs have a higher level of review and rigor than microcredentials (that we have seen). **Can evidence of program completion for approved/accredited programs meet the License Level 3? Why can’t completed courses count in the same way as “microcredentials?”**
4. How specifically are we addressing the lack of diversity in this model?

### All Levels: EPP Accountability

1. The EPP accountability model still holds EPPs to edTPA/PPAT standard and testing requirement standards. What’s the plan to roll that back BEFORE ANY PIECES OF THIS MODEL are put into play?
2. If a candidate attempts but does not pass edTPA while enrolled at an EPP under current requirements, they must pass it later to progress in licensure. If they are permitted to satisfy pedagogy requirements via other means (e.g., MCs) under the new plan, how will the impact this will have on edTPA pass rates be addressed? If, for example, such a candidate later

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completed a MC to satisfy the pedagogy requirement instead of resubmitting edTPA, would that count as a “pass” for the EPP? How will this be addressed in the Title II process?

3. If the proposal does not specifically mention approved EPPs, does that remove the approval process for EPPs and/or districts to serve as a “sponsor”?
4. How will the current EPP accountability model be extended to include PSUs which will now license teachers? Will they, too, receive sanctions?

We would welcome additional dialogue to discuss these concerns with any members of the PEPSC commission who are interested. Thank you for your attention to our questions and observations.

Sincerely,

The North Carolina Association of Colleges for Teacher Education (NCACTE)

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