

**Notice of Adoption Regarding Readoption with Amendments of N.J.A.C. 6A:9A,
New Jersey Educator Preparation Programs**

The following is the accessible version of the notice of adoption for the readoption with amendments of N.J.A.C. 6A:9A.

Education

State Board of Education

New Jersey Educator Preparation Programs

Readoption with Amendments: N.J.A.C. 6A:9A

Adopted New Rules: N.J.A.C. 6A:9A-3.2 and 5.7

Proposed: December 19, 2022, at 54 N.J.R. 2282(a).

Adopted: April 5, 2023, by the New Jersey State Board of Education, Angelica Allen-McMillan, Ed.D, Acting Commissioner, Department of Education, Acting Secretary, State Board of Education.

Filed: April 6, 2023, as R.2023 d.060, **without change**.

Authority: N.J.S.A. 18A:1-1, 18A:4-15, 18A:6-34 and 38, and 18A:26-2.7 and 10; and P.L. 2012, c. 11.

Effective Dates: April 6, 2023, Readoption;
 May 1, 2023, Amendments and New Rules.

Expiration Date: April 6, 2030.

Summary of Public Comments and Agency Responses:

The following is a summary of the comments received from members of the public and the Department of Education's (Department) responses. Each commenter is identified at the end of the comment by a number that corresponds to the following list:

1. Debra J. Bradley, Esq., Director of Government Relations, New Jersey Principals and Supervisors Association
2. David J. Shernoff, Ph.D., Director, Center for Mathematics, Science, and Computer Education, and Associate Professor, Department of School Psychology, Graduate School of Applied and Professional Psychology, Rutgers University

3. Dave Janosz, retired Supervisor of Technology Education, Northern Valley Regional High School District
4. Mark Wallace, retired technology education teacher and administrator
5. Matthew Konowicz, Director of Instruction, Northern Burlington County Regional School District
6. Brian J. Drelick, Supervisor of STEM, High Point Regional High School
7. Nick Beykirch, Technology education teacher, William Annin Middle School, Bernards Township Public Schools
8. Paul Amoroso, Superintendent, Pompton Lakes School District
9. Ellen Miller
10. Jean Public
11. Dina Scacchetti, Professor in Residence, William Paterson University
12. Tabitha Dell'Angelo, Ph.D., Interim Dean, School of Education, The College of New Jersey
13. LaChan V. Hannon, Ph.D., Director of Teacher Preparation and Innovation, Department of Urban Education, Rutgers University- Newark
14. Liana Fornarotto, Director, Education Enrollment and Certification, William Paterson University
15. Dr. Stacey Leftwich, President, New Jersey Association of Colleges for Teacher Education
16. Dr. Ismael Flores Marti, Department of Kinesiology, William Paterson University
17. Dr. David Aderhold, Superintendent of Schools, West Windsor-Plainsboro Regional School District, and John "Kenyon" Kummings, Superintendent of Schools, Wildwood City School District, on behalf of the New Jersey Association of School Administrators' Recruitment and Retention Committee

18. Margaret Renn, College of Education, William Paterson University
 19. Chris Ireland, Supervisor of Visual and Performing Arts and Related Areas,
Hillsborough Township Public Schools
 20. Ronald M. Durso, Supervisor of Technology Education, Fairlawn School District
 21. Erica DeMichele, K-12 Supervisor of Science, Technology, Engineering,
Sustainability and Co-STEM, Delran Township Public Schools
 22. Ryan DelGuercio, Supervisor of Technology and Engineering Department/Dean
of Students, West Orange High School
 23. Danielle Dagounis, Director of Education, School District of the Chathams
 24. Guida Faria, Supervisor of Science, Engineering and Gifted and Talented, Scotch
Plains-Fanwood School District
 25. John P. Pascale, Principal, Mahwah High School
 26. Alan Gunneson, teacher of applied technology, Westwood Regional High School
 27. Matthew Ducker Duffy, Technology education teacher and Robotics Team
advisor, Scotch Plains-Fanwood High School
 28. Matt Potter, Technology education teacher, Bunker Hill Middle School,
Washington Township School District
 29. Laura Kinney, Technology education teacher, Washington Township Public Schools
 30. Timothy Zavacki
 31. Ryan Riess, Past President, New Jersey Technology and Engineering Association
 32. Steven Whalen, Technology education teacher, Washington Township High School
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1. Comment: The commenter stated that the New Jersey Principals and Supervisors
Association (NJPSA) conducted an informal survey to ascertain the extent of current

staffing vacancies and the resulting impact on students, the Department certification process, and student teachers. The commenter acknowledged that the readoptions with amendments at N.J.A.C. 6A:9, 9A, 9B, and 9C present a pivotal opportunity and urged the Department to strategically address these long-term issues. The commenter urged the State Board of Education (State Board) to become advocates for the education profession and, as it reviews the proposals at N.J.A.C. 6A:9, 9A, 9B, and 9C, consider the current school district context to proactively adopt policies that:

- Foster early interest in the profession;
- Increase completion rates of educator preparation programs;
- Incorporate flexibility and multiple pathways, including online learning opportunities, for candidates to demonstrate their knowledge;
- Remove unnecessary barriers to certification while balancing the foundational need for quality teaching for all students;
- Recognize that instructional decisions should not be driven by staffing availability (for example, increased class size, decreased course offerings, and increased use of substitutes);
- Streamline Department certification policies and procedures to expedite the issuance of educator certificates;
- Consider the need for expanding candidate pools by reducing the “over-specialization” approach of the existing certification system;
- Expand New Jersey’s approach to reciprocity with other states to attract out-of-State teachers who have proven to be successful in other states;

- Recognize the high demand at the school district level for increased candidate pools and incorporate trust in school districts' ability to develop and support novice teachers on the job;
- Promote the retention of teachers through fair and balanced workplace policies (that is, mentoring, evaluation, and professional development) on issues within the New Jersey Administrative Code; and
- Collaborate and support the higher education community to ensure that new educator preparation program proposals are feasible, developed in a timely manner to meet student needs, have clear requirements, and are well-communicated to teachers. (1)

Response: The Department appreciates the comment, as the amendments at N.J.A.C. 6A:9, 9A, 9B, and 9C aim to create additional pathways and opportunities for individuals to meet certification requirements. The Department's intent is to increase the educator pool, while maintaining educator standards and quality. The amendments offer add-on endorsement opportunities, streamlined reciprocity rules, and address mentoring and professional development for new and novice teachers.

2. Comment: The commenter stated that the teacher staffing data that will be collected pursuant to P.L. 2021, c. 394, will be useful and will inform decision-making and future policy-making related to the educator workforce. The commenter also stated that NJPSA members have indicated that there are open positions in a variety of school staff positions and there is a growing frustration with the narrowed hiring pools, particularly at the middle and high school levels, which often result from the highly specialized nature of the Department's certification requirements. The commenter further stated that there is

clear evidence that students of color benefit from having a diverse teacher workforce and New Jersey schools do not currently reflect the diversity of the student population. In support of these positions, the commenter provided data collected by the NJPSA demonstrating staffing issues. (1)

Response: The Department appreciates the issues that school administrators are facing as they hire individuals to staff schools. The Department agrees that the additional data at P.L. 2021, c. 394, will help inform policy, as well as school districts' hiring practices.

The Department's current rulemaking aims to widen the teacher pipeline. The Department proposed, at N.J.A.C. 6A:9A-5.6, to offer an additional pathway for educators to become mathematics and science teachers. Adopted in June 2022, N.J.A.C. 6A:9B-8A also authorizes a five-year limited CE/limited CEAS pilot program, which allows an exemption of one certificate requirement for candidates who meet all other certificate requirements and work in school districts that participate in the pilot program. The Department will analyze data collected through the pilot program to determine the impact of certification requirements on teacher effectiveness and student outcomes and, if necessary, make recommendations for future amendments in this area.

3. Comment: Recognizing the significance of the State Program Approval Council (SPAC) in providing recommendations concerning the quality of educator preparation programs, the commenter recommended that N.J.A.C. 6A:9A-3.2(a)3 be amended to include a principal as one of the four educators (preschool to grade 12) on the SPAC. The commenter stated that principals hire, supervise, and mentor candidates who will graduate from educator preparation programs and the unique perspective of a principal is essential to the SPAC's work. (1)

Response: The Department appreciates the feedback, but declines to add a principal as one of the mandatory members of the SPAC. During the application process for membership on the SPAC, the Department considers a variety of different factors, including a candidate's current position and experience. Several current SPAC members are principals or former principals. The Department values the experiences and perspectives of all practitioners when reviewing educator preparation programs. However, the Department does not find it necessary to codify specific roles, as the existing language -- "practitioner from preschool through grade 12" -- is inclusive of teachers, administrators, and educational services professionals.

4. Comment: The commenter suggested that the Department amend recodified N.J.A.C. 6A:9A-3.3(c) for greater clarity to state that the Commissioner "shall review and may re-approve all educator preparation programs at least every seven years." (1)

Response: The Department disagrees with the commenter because the suggested language is inherent at recodified N.J.A.C. 6A:9A-3.3(c), as amended, as follows: "The Commissioner may re-approve all educator preparation programs at least every seven years. The Commissioner has the authority and discretion to periodically review educator preparation programs more frequently." During the review process, the Commissioner has the discretion not to re-approve a program.

5. Comment: The commenter commended the Department for the proposed inclusion, at recodified N.J.A.C. 6A:9A-3.3E, of diversity demographics and evidence on preparation in pedagogy on literacy infusion in all grade levels as two new components in the review of application for new educator preparation programs. (1)

Response: The Department appreciates the feedback.

6. Comment: The commenter stated that a separate requirement for the Praxis Core or alternate pathway is redundant and unnecessary because a candidate demonstrates basic skills by meeting the degree requirements, content knowledge requirements (Praxis 2 tests), the required coursework in the area of certification (depth of knowledge), and the one-year student teaching requirement (pedagogy), and by obtaining district employment based upon their performance. The commenter also urged the State Board to eliminate the unnecessary, duplicative requirements that are costly in time and money and create barriers to teacher candidates. (1)

Response: Prior to entering a CEAS educator preparation program, a candidate must demonstrate basic reading, writing, and mathematics skills. CEAS candidates take the Praxis Core prior to entering an educator preparation program and the Praxis 2 content knowledge assessment at the completion of the program. The Department disagrees with the commenter that the Praxis Core or alternate pathway is unnecessary, as the Praxis Core determines whether candidates have the basic skills necessary to be successful in an educator preparation program. Many candidates are expected to demonstrate basic skills to enter an educator preparation program, which often occurs before a candidate earns a degree. The alternate measures at N.J.A.C. 6A:9A-4.3 will eliminate redundancy for individuals holding advanced degrees.

7. Comment: The commenters suggested changes at N.J.A.C. 6A:9A-4.3(d) related to basic skills requirements and at N.J.A.C. 6A:9B-10.2 and 11.2 related to prescriptive curriculum. The commenters stated that requiring the basic skills assessment for entry into educator preparation programs coincided with a decline in educators entering the field. The commenters also stated that multiple factors, such as salary, benefits, career ladder, school

environment, and view of the profession, are contributing to teacher shortages. The commenters suggested that the Department remove or redefine the basic skills requirement for entrance into educator preparation programs to diversify the teacher workforce. The commenters recommended that candidates be required to meet the basic skills requirement by earning at least 60 college credits and achieving a 3.0 cumulative grade point average (GPA), which, the commenters contended, is evidence of basic skills. The commenters stated that the Department has not provided data or studies that demonstrate the impact of the basic skills requirement on teacher quality and composition. The commenters also stated that administrators have indicated, and studies have demonstrated, that it is more important for teachers to have certain soft skills that cannot be measured by a test. The commenters further stated that entrance and licensure exam cut scores have a history of negatively impacting teacher diversity. The commenters stated that the proposed flexibility at N.J.A.C. 6A:9A-4.3 for the basic skills assessment addresses alignment between the SAT, ACT, and GRE scores and the Praxis Core scores, but fails to fully address Praxis Core flexibility. The commenters also stated that the Department's previous response to similar concerns reference the limited CE/limited CEAS pilot program, but the commenters contested that the pilot program will not provide a quick analysis of data to address the immediate teacher shortage. The commenters stated that the teacher shortage will worsen while the data from the pilot program is analyzed. The commenters further stated that there will also be no limited CEAS basic skills data to analyze because the limited CEAS exempts candidates from only Praxis 2 and GPA requirements. (14 and 18)

Response: The Department declines to make the commenters' suggested changes to the basic skills assessment requirement, which is one measure, among others, that helps to determine a

potential educator's academic readiness for an educator preparation program. The amendments at N.J.A.C. 6A:9A-4.3(d)1 and 2 will provide multiple options for a candidate to demonstrate basic skills proficiency, thereby reducing redundancy for candidates who demonstrate proficiency through means other than the basic skills test. The Department agrees that educator preparation programs address other measures that support educator readiness. The proposed and current flexibilities offer great potential to widen the teacher pipeline. The Department is committed to diversifying the teacher workforce and has analyzed data that demonstrates, over time, a slight, but steady, increase in teacher diversity. Other teacher diversity efforts, such as the Minority Teacher Quality and Retention Grant, Minority Teacher Development Grant, and Men of Color Hope Achievers pilot program, have produced promising practices to further the Department's diversity goals.

The limited CE/limited CEAS pilot program is aligned to the authorizing statute at N.J.S.A. 18A:26-2b et seq., which established the exemptions allowed for the limited CE and limited CEAS. The Department will collect and analyze data in accordance with the law.

8. Comment: The commenter supported the provisions at N.J.A.C. 6A:9A-4.3 that permit multiple pathways for a candidate to demonstrate basic skills proficiency other than the Praxis Core. The commenter stated that the proposed amendments at recodified N.J.A.C. 6A:9A-4.3(d)1i to allow candidates to demonstrate basic skills proficiency by achieving a Commissioner-established qualifying minimum score on the SAT, ACT, or GRE that is approximately equal to the top-half percentile score for all test takers in the year the respective test was taken demonstrates that the Department is recognizing the critical need for instructional staff while maintaining basic skills competency in candidates. The commenter also acknowledged that proposed N.J.A.C. 6A:9A-4.3(d)2 will enable

candidates who start a program in or after academic year 2022-2023 to demonstrate basic skills proficiency by holding a master's degree, or an advanced or higher degree from an accredited higher education institution with a minimum GPA of 3.0. The commenter stated that the Department could further enhance N.J.A.C. 6A:9A-4.3 while maintaining teacher standards by allowing candidates to demonstrate basic skills proficiency by holding a bachelor's degree with a minimum GPA of 3.0. The commenter stated that successfully managing college-level work demonstrates the basic skills required for a certificate. (1)

Response: The Department disagrees with the commenter because the basic skills test requirement is one measure that helps to determine a potential educator's academic readiness, in addition to the content area assessment, degree, and educator preparation requirements. Recodified N.J.A.C. 6A:9A-4.3(d)1 and 2, as amended, will provide multiple options for a candidate to demonstrate basic skills proficiency, thereby reducing redundancy for candidates who demonstrate proficiency through means other than the basic skills test. The Department contends that the amendments at recodified N.J.A.C. 6A:9A-4.3(d) will offer adequate flexibility to demonstrate basic skills. Candidates holding a bachelor's degree may demonstrate basic skills through the alternative measures, such as scoring in the top-half percentile on the SAT, ACT, or GRE in lieu of taking Praxis Core. Collectively, these new measures will help to ensure properly prepared educators for New Jersey students. Additionally, N.J.A.C. 6A:9B-8A effectuates a five-year limited CE/limited CEAS pilot program pursuant to N.J.S.A. 18A:26-2b et seq., which allows exemptions to the basic skills requirement for limited CE or limited CEAS candidates who meet all other certificate requirements and work in school districts that participate in the pilot program. The Department will analyze data collected through the pilot program to determine the impact of

basic skills requirements on teacher effectiveness and student outcomes and, if necessary, make recommendations for future amendments in this area.

9. Comment: The commenters stated that New Jersey has experienced, during the past 10 years, a dramatic decline in the number of people entering educator preparation programs and the teaching profession. The commenter stated that the following issues have impacted the teacher shortage:

- The lack of certified teachers has resulted in substitute teachers instructing students;
- Paraprofessionals who have demonstrated the skills and knowledge to be teachers of record are not able to overcome the barrier of the basic skills requirement to enter a CEAS or CE educator preparation program;
- The real basic skills that teachers need are passion, drive, empathy, and commitment to students. Individuals should have the opportunity to enter an educator preparation program, build content knowledge, and demonstrate the skills to be an effective teacher; and
- High school students are losing interest as a career in education because of the number of high-stakes requirements.

The commenters also requested that the Department eliminate or modify the basic skills test for entry into educator preparation programs. (11, 14, and 18)

Response: The Department declines to make the commenters' suggested change because the basic skills test requirement is one measure that helps to determine a potential educator's academic readiness, in addition to the content assessment, degree, and educator preparation requirements. Recodified N.J.A.C. 6A:9A-4.3(d)1 allows a candidate to demonstrate proficiency by scoring in the top-half on the SAT, ACT, or

GRE instead of in the top-third. The Department proposed new N.J.A.C. 6A:9A-4.3(d)2 to allow a candidate to demonstrate proficiency in basic reading, writing, and mathematics skills by holding a master's or higher degree with a minimum GPA of 3.0. The amendments at N.J.A.C. 6A:9A-4.3(d)1 and 2 provide multiple options for a candidate to demonstrate basic skills proficiency, thereby reducing redundancy for candidates who demonstrate proficiency through means other than the basic skills test. Collectively, these measures will help to ensure properly prepared educators for New Jersey students.

The limited CE/limited CEAS pilot program rules at N.J.A.C. 6A:9B-8A, also allow exemptions to the basic skills requirement for limited CE candidates who meet all other certification requirements and work in school districts that participate in the pilot program. The Department will analyze data collected through the pilot program to determine the impact of basic skills requirements on teacher effectiveness and student outcomes and, if necessary, make recommendations for future amendments in this area.

10. Comment: The commenter stated that the Department has created another obstacle for potential candidates who want to enter the field of teaching by requiring them to meet a cut score on the SAT, ACT, or Praxis Core. The commenter also stated that the candidates have already demonstrated college readiness, but the basic skills requirement is a deterrent to choosing teaching as a college pathway. The commenter further stated that this especially impacts potential candidates from historically marginalized groups and disadvantaged schools. The commenter also stated that the Department has not shown empirical evidence that performance on the basic skills requirement is related to teacher quality. The commenter further stated that many colleges and universities have

made the SAT and ACT optional. The commenter also stated admissions counselors report that the majority of students who submit test results have scored very high, which, the commenter contended, may skew the cut scores. The commenter stated that teachers need to be content knowledge experts, culturally competent, and lifelong learners, which is gained through a high-quality educator preparation program, engaging fieldwork, content studies that engage intellectual curiosity, and mentorship. The commenter further contended that the indication of success for future teachers is assessed through their coursework and fieldwork and demonstrated through their GPA, performance assessments, disposition assessments, and observation notes, rather than through the SAT, ACT, or Praxis Core. (12)

Response: The Department disagrees with the commenter's assertion that the amendments at N.J.A.C. 6A:9A-4.3 create an additional obstacle for candidates. The amendments offer additional options for individuals to demonstrate basic skills, which will result in flexibility that maintains quality, but removes duplicative measures. The amendments allow candidates to demonstrate basic skills through either Praxis Core, holding an advanced degree with a 3.0 GPA, or scoring in the top-half percentile on the SAT, ACT, or GRE, as opposed to the top-third percentile.

11. Comment: The commenter suggested that the Department eliminate the basic skills requirement. The commenter acknowledged that teachers must have minimum requisite knowledge and skills and that rigor and high expectations are important, but contended that the test is misaligned to the goal and may prevent potential candidates from entering the teaching profession. The commenter stated that a decline in the number of candidates entering the profession has impacted school districts' ability to fill vacancies. (8)

Response: The Department declines to make the commenter's suggested change because the basic skills test requirement is one measure that helps to determine a potential educator's academic readiness, in addition to the content assessment, degree, and educator preparation requirements. Recodified N.J.A.C. 6A:9A-4.3(d)1 allows a candidate to demonstrate proficiency by scoring in the top-half on the SAT, ACT, or GRE instead of in the top-third, as currently allowed. The Department proposed new N.J.A.C. 6A:9A-4.3(d)2 to allow a candidate to demonstrate proficiency in basic reading, writing, and mathematics skills by holding a master's or higher degree with a minimum GPA of 3.0. The amendments at N.J.A.C. 6A:9A-4.3(d)1 and 2 will provide multiple options for a candidate to demonstrate basic skills proficiency, thereby reducing redundancy for candidates who demonstrate proficiency through means other than the basic skills test. Collectively, these measures will help to ensure properly prepared educators for New Jersey students.

The limited CE/limited CEAS pilot program rules at N.J.A.C. 6A:9B-8A also allow exemptions to the basic skills requirement for limited CE candidates who meet all other certification requirements and work in school districts that participate in the pilot program. The Department will analyze data collected through the pilot program to determine the impact of certain requirements on teacher effectiveness and student outcomes and, if necessary, make recommendations for future amendments in this area.

12. Comment: The commenter requested that the Department set equitable and balanced entry measures for educator preparation programs to reduce barriers to high-quality candidates. The commenter welcomed the proposed amendments at N.J.A.C. 6A:9A-4.3 to waive the basic skills test (Praxis Core) for admission to a certificate of eligibility with advanced

standing (CEAS) educator preparation program and at N.J.A.C. 6A:9B-8.3 for the certificate of eligibility (CE) for candidates who score in the top 50 percent of the ACT, SAT, or GRE percentile Statewide. The commenter also noted that colleges and universities are moving away from these tests because of historically structural racial inequities. Given the negative consequential validity of entry tests, the commenter asked the Department to consider longitudinal and more equitable measures, like cumulative GPA, that are more reliable for evaluating applicants for college admission. The commenter asserted that the Department's narrow focus on the SAT, ACT, GRE, or Praxis Core, places the following additional inequities on prospective teacher candidates: prospective teachers will pay standardized test fees that are not expected of new college students in other majors; prospective teachers of color face the negative impact of stereotype threat on their scores; and during the past three to five years, test takers in New Jersey are skewing primarily toward high school students who seek admission to elite universities that still require SAT, ACT, or GRE scores as a standalone admission criterion. The commenter requested that the Department discontinue the use of inequitable standardized tests and amend N.J.A.C. 6A:9A-4.3 and 6A:9B-8.3 to consider balancing the additional GPA measure to partially alleviate some of the inequity inherent in a single, high-stakes standardized test score. The commenter also stated that the requested change is in accordance with the longstanding flexibility at N.J.A.C. 6A:9B-8.2 related to candidates completing a CEAS educator preparation program. (15)

Response: The Department declines to adopt the commenter's suggested change because the basic skills test requirement is one measure that helps to determine a potential educator's academic readiness, in addition to the content assessment, degree, and educator

preparation requirements. Recodified N.J.A.C. 6A:9A-4.3(d)1 and the amendments at N.J.A.C. 6A:9B-8.3(a)5 allow a candidate to demonstrate proficiency by scoring in the top-half on the SAT, ACT, or GRE instead of in the top-third. The Department proposed new N.J.A.C. 6A:9A-4.3(d)2 and 6A:9B-8.3(a)5ii to allow a candidate to demonstrate proficiency in basic reading, writing, and mathematics skills by holding a master's or higher degree with a minimum GPA of 3.0. The amendments at N.J.A.C. 6A:9A-4.3(d)1 and 2 and 6A:9B-8.3(a)5 will provide multiple options for a candidate to demonstrate basic skills proficiency, thereby reducing redundancy for candidates who demonstrate proficiency through means other than the basic skills test. Collectively, these measures will help to ensure properly prepared educators for New Jersey students.

13. Comment: The commenter supported recommendations made by professional education organizations, including increased flexibility for the basic skills test requirement for entry into educator preparation programs, paid clinical opportunities, educator preparation program discretion regarding curriculum to attain outcomes-based expectations, and modification of the Social Security number requirement for teacher certification. The commenter stated that standardized assessments have inequitable consequences for diverse learners. The commenter recommended revisions at N.J.A.C. 6A:9A and 9B to remove or further modify the basic skills test requirement for individuals seeking to enter a teacher preparation program or earn a CE. The commenter contended that many potential teacher candidates who have the passion and disposition to be impactful teachers are being kept out of the profession because of the current basic skills test requirement. The commenter cited an article that asserted that entrance and exit exams have eliminated potential teachers of color from entering the teaching profession. The commenter stated that if New Jersey

intends to increase teacher diversity, then the State must reimagine and redefine how basic skills are measured. (13)

Response: The Department declines to make the commenter's suggested change because the basic skills test requirement is one measure that helps to determine a potential educator's academic readiness, in addition to the content assessment, degree, and educator preparation requirements. The amendments and recodification at N.J.A.C. 6A:9A-4.3(d)1 allow a candidate to demonstrate proficiency by scoring in the top-half on the SAT, ACT, or GRE instead of in the top-third. The Department proposed new N.J.A.C. 6A:9A-4.3(d)2 to allow a candidate to demonstrate proficiency in basic reading, writing, and mathematics skills by holding a master's or higher degree with a minimum GPA of 3.0. The amendments at N.J.A.C. 6A:9A-4.3(d)1 and 2 provide multiple options for a candidate to demonstrate basic skills proficiency, thereby reducing redundancy for candidates who demonstrate proficiency through means other than the basic skills test. Collectively, these measures will help to ensure properly prepared educators for New Jersey students.

14. Comment: The commenter supported recommendations made by professional education organizations, including increased flexibility for the basic skills test requirement for entry into educator preparation programs, paid clinical opportunities, and educator preparation program discretion regarding curriculum to attain outcomes-based expectations. The commenter stated that standardized assessments have inequitable consequences for diverse learners. The commenter recommended revisions at N.J.A.C. 6A:9A and 9B to remove or further modify the basic skills test requirement for individuals seeking to enter a teacher preparation program or earn a Certificate of Eligibility (alternate route). The commenter stated that the skills needed to be an effective teacher include organization of thoughts, activities, and space; clear and

appropriate communication; and positive management. The commenter cited an article that asserted that entrance and exit exams have eliminated potential teachers of color from entering the teaching profession. The commenter stated that if New Jersey intends to increase teacher diversity, then the State must reimagine and redefine how basic skills are measured. The commenter recommended allowing a candidate to meet the basic skills requirement by achieving a 3.0 GPA after earning 60 college credits. (14)

Response: The Department declines to make the commenter's suggested change because the basic skills test requirement is one measure that helps to determine a potential educator's academic readiness, in addition to the content assessment, degree, and educator preparation requirements. The amendments and recodification at N.J.A.C. 6A:9A-4.3(d)1 allow a candidate to demonstrate proficiency by scoring in the top-half on the SAT, ACT, or GRE instead of in the top-third. The Department proposed new N.J.A.C. 6A:9A-4.3(d)2 to allow a candidate to demonstrate proficiency in basic reading, writing, and mathematics skills by holding a master's or higher degree with a minimum GPA of 3.0. The amendments at N.J.A.C. 6A:9A-4.3(d)1 and 2 provide multiple options for a candidate to demonstrate basic skills proficiency, thereby reducing redundancy for candidates who demonstrate proficiency through means other than the basic skills test. Collectively, these measures will help to ensure properly prepared educators for New Jersey students.

15. Comment: The commenter expressed support for the Department's proposal at N.J.A.C. 6A:9B that increase flexibility for certification requirements. The commenter contended that many candidates are qualified to teach, but cannot pursue a certificate because of GPA, degree, or educational background. The commenter stated that many of the individuals end up working as substitutes or paraprofessionals. The commenter

encouraged the Department to continue offering flexibilities in meeting the GPA requirements to increase the diversity of classroom teachers. (9)

Response: The Department appreciates the commenter's feedback. Recodified N.J.A.C. 6A:9A-4.3(d)1 allow a candidate to demonstrate proficiency by scoring in the top-half on the SAT, ACT, or GRE instead of in the top-third. The Department proposed new N.J.A.C. 6A:9A-4.3(d)2 to allow a candidate to demonstrate proficiency in basic reading, writing, and mathematics skills by holding a master's or higher degree with a minimum GPA of 3.0. The amendments at N.J.A.C. 6A:9A-4.3(d)1 and 2 will provide multiple options for a candidate to demonstrate basic skills proficiency, thereby reducing redundancy for candidates who demonstrate proficiency through means other than the basic skills test. Collectively, these measures will help to ensure properly prepared educators for New Jersey students.

The limited CE/limited CEAS pilot program rules at N.J.A.C. 6A:9B-8A also allow exemptions to the basic skills requirement for limited CE candidates who meet all other certification requirements and work in school districts that participate in the pilot program. The Department will analyze data collected through the pilot program to determine the impact of certain requirements on teacher effectiveness and student outcomes and, if necessary, make recommendations for future amendments in this area.

16. Comment: The commenter suggested that the Department remove the basic skills test as a program entry requirement because the test is implemented incorrectly and candidates need skills that cannot be measured by an assessment to be successful. The commenter stated that the basic skills test blocks candidates who cannot progress through the education sequence of courses because they are unable to pass the Praxis Core. (16)

Response: The Department declines to make the commenter's suggested change because the basic skills test requirement is one measure that helps to determine a potential educator's academic readiness, in addition to the content assessment, degree, and educator preparation requirements. Recodified N.J.A.C. 6A:9A-4.3(d)1 allows a candidate to demonstrate proficiency by scoring in the top-half on the SAT, ACT, or GRE instead of in the top-third. The Department proposed new N.J.A.C. 6A:9A-4.3(d)2 to allow a candidate to demonstrate proficiency in basic reading, writing, and mathematics skills by holding a master's or higher degree with a minimum GPA of 3.0. The amendments at N.J.A.C. 6A:9A-4.3(d)1 and 2 will provide multiple options for a candidate to demonstrate basic skills proficiency, thereby reducing redundancy for candidates who demonstrate proficiency through means other than the basic skills test. Collectively, these measures will help to ensure properly prepared educators for New Jersey students.

17. Comment: The commenter stated that additional amendments at N.J.A.C. 6A:9A are necessary to address the teacher shortage by removing barriers to entering the profession. The commenter suggested the Department reduce the number of clinical practice hours required at N.J.A.C. 6A:9A-4.4, which requires clinical interns to complete 175 hours of clinical practice prior to the full-time semester of clinical practice. (17)

Response: The clinical practice component of teacher preparation at N.J.A.C. 6A:9A-4.4 is designed to gradually release responsibilities and increase rigor of the clinical aspects of educator preparation programs. Clinical experience is the diverse, guided, hands-on, practical application and demonstration of professional knowledge, skills, and dispositions through integrated, collaborative, and facilitated learning and practice. Clinical experience takes place in early field, practicum, and other opportunities that

occur prior to clinical practice across a variety of settings and are integrated throughout the educator preparation program. Clinical practice is the culminating field-based experience or internship. In this hands-on experience in a preschool through grade 12 setting, candidates demonstrate their knowledge, skills, and dispositions to be effective educators. The Department declines to make the commenters' suggestions because educator preparation programs have the discretion to determine the distribution of the required 175 hours of clinical practice. The 175 hours of clinical practice can be divided among two semesters with 100 hours occurring the semester immediately before the full-time semester of clinical practice.

18. Comment: The commenter stated that New Jersey holds candidates to a higher standard than many other states by requiring a one-year period of clinical practice as part of a CEAS educator preparation program. The commenter recognized the importance of the student teaching experience and stated that the one-year student teaching requirement places fiscal burdens on teaching candidates who must often quit necessary part-time employment to carry out the student teaching experience. The commenter recommended that student teaching should mirror other apprenticeship programs in other trade areas or medicine, where candidates are paid during the mandatory working and learning period. The commenter suggested that New Jersey consider paying the teacher candidate for the student teaching experience to strengthen interest in the teaching profession. The commenter further suggested the Department invest in Elementary and Secondary School Emergency Relief (ESSER), Title II, and other relevant funding to support such an initiative and that it could be a comprehensive approach to recruitment for the next generation of educators. (1)

Response: The Department agrees with the commenter that the hands-on experience of the clinical practice is a vital training component for educators before entering the classroom as a teacher of record. The Department understands the financial costs associated with clinical practice for teacher candidates and the rules do not prohibit paying student teachers during the clinical component. The Department encourages local education agencies and educator preparation programs to develop residency models.

19. Comment: The commenter requested that the Department amend N.J.A.C. 6A:9A-4.4 to provide for more equitable, paid clinical hours. The commenter stated that while the section is silent on whether candidates may complete some of their clinical hours in paid employment in public schools, many school districts and educator preparation programs are reluctant to enter paid internship arrangements absent clear guidance from the Department. The commenter requested that the Department amend N.J.A.C. 6A:9A-4.4(a)3 and (c) to explicitly include paid internships. (15)

Response: The Department agrees that clinical interns add value to schools and students during the clinical practice component of their training. It is the decision of the local education agency or the educator preparation program to determine if clinical interns are compensated. There are several strong models of paid residencies and clinical internships existing across New Jersey that comply with the rules at N.J.A.C. 6A:9A governing clinical experience and clinical practice.

20. Comment: The commenter commended the Department for creating “add-on endorsements” at N.J.A.C. 6A:9A-5.6 in the areas of mathematics and science. The commenter stated that this approach to add-on endorsements for currently certified teachers maximizes the skills of teachers motivated to pursue additional endorsements

and expands the breadth of knowledge in the content area. The commenter asked why the Department's approach is limited to science and mathematics and does not include additional endorsement areas. The commenter also stated that earning an add-on endorsement involves significant investment of time and money for an already overburdened teacher and the tuition reimbursement funds offered by local education agencies are limited. The commenter recommended the return to less specialized endorsements to enhance certificate flexibilities and scope. (1)

Response: The amendments at N.J.A.C. 6A:9A-5.6 concentrate specifically on the add-on endorsements for mathematics and science because these high-need areas require additional content knowledge. Many of the other high-need areas, such as bilingual/bicultural and teacher of students with disabilities endorsements, require nuanced specialized pedagogy to meet the needs of vulnerable student populations. Other high-need areas like career and technical education require industry experience. The Department's proposals to address high-need areas are aligned to the requirements of the specific roles, rather than proposing a single solution for all high-need areas. N.J.A.C. 6A:9B, as proposed for readoption with amendments, will allow for flexibilities in other subject areas identified as high need. For example, N.J.A.C. 6A:9B-8.8, as amended, will eliminate redundant requirements for out-of-State candidates seeking reciprocity for bilingual/bicultural and teacher of students with disabilities endorsements. The Department also proposed additional certification and endorsement pathways for educational interpreters and teachers for the deaf or hard-of-hearing with sign language communication endorsement.

The Department agrees that expanding the breadth of the content that an educator

can teach is important. The Department proposed new N.J.A.C. 6A:9B-11.9(d) and (e) to create two new middle school with subject-matter specialization endorsements in science, technology, engineering, and mathematics (STEM), and humanities. The new endorsements will broaden the existing middle school content areas and provide more flexibility for the school districts in placing educators in middle-grade classrooms.

21. Comment: The commenter stated that technology and engineering literacy is an important part of the New Jersey Student Learning Standards (NJSLS) and that many schools are being forced to shut down technology education programs due to a lack of certified teachers. The commenter asked the Department to allow certified teachers to earn 15 credits around the three core principals of technology and engineering education to earn the add-on endorsement by adding the technology education endorsement to the proposals at N.J.A.C. 6A:9A-5.6(d) and (e). The commenter stated that additional choice electives could help train a teacher to meet specific needs of individual school districts. The commenter stated that the “TE” (technology and engineering) in STEM allows students opportunities to apply their science and mathematics in authentic ways. (2)

Response: The Department declines to make the commenter’s suggestion. The amendments at N.J.A.C. 6A:9A-5.6 concentrate specifically on add-on endorsements for mathematics and science because the high-need areas require only additional content knowledge aligned to mathematics and science coursework to meet the content requirement. Technology education is a specialized endorsement area requiring specific topics to be covered within a technology education educator preparation program. Requirements for the technology education endorsement at N.J.A.C. 6A:9B-10.6 include

nuanced requirements and specific courses beyond the pathway designed for mathematics and science teachers at N.J.A.C. 6A:9A-5.6.

22. Comment: The commenter stated that Rutgers University has developed a 15-credit certificate program that leads to a Maker Education Certificate, which the commenter stated includes high-quality, rigorous training in technology and engineering for teachers. The commenter requested that the Department consider this program and courses to satisfy a 15-credit add-on endorsement. (2)

Response: The Department declines to make the commenter's suggestion. The amendments at N.J.A.C. 6A:9A-5.6 concentrate specifically on the add-on endorsements for mathematics and science because these high-need areas only require only additional content knowledge aligned to mathematics and science coursework to meet the content requirement. Technology education is a specialized endorsement area requiring specific topics be covered within a technology education educator preparation program.

Requirements for the technology education endorsement at N.J.A.C. 6A:9B-10.6 include nuanced requirements and specific courses beyond the pathway designed for mathematics and science teachers at N.J.A.C. 6A:9A-5.6. The Department cannot evaluate individual programs in the context of a rulemaking.

23. Comment: The commenter suggested that the Department shift the mindset for technology education to result in more individuals entering the field. The commenter contended that the pool of applicants to teach technology is shallow and that breaking barriers and creating new endorsements will open opportunities for individuals to enter the teaching field. (3)

Response: The amendments at N.J.A.C. 6A:9A-4.3(d)1 and 2 provide multiple options for a candidate to demonstrate basic skills proficiency, thereby allowing additional flexibilities

to widen the teacher pipeline. The five-year limited CE/CEAS pilot program allows exemptions to the basic skills requirement for limited CE candidates that meet all other certificate requirements and work in school districts that participate in the pilot program. The Department will analyze data collected through the pilot program to determine the impact of basic skills requirements on teacher effectiveness and student outcomes and, if necessary, make recommendations for future amendments in this area. These innovative flexibilities will help to widen the teacher candidate pool for individuals looking to enter the field, including candidates for technology education teaching positions.

24. Comment: The commenters stated that now is the appropriate time for the Department to reexamine the requirement of a 30-credit course sequence for any add-on endorsement. The commenters referenced the technology education endorsement and stated there are only two New Jersey educator programs at the undergraduate level for technology education. The commenters suggested that a pathway for instructional certificate holders to obtain a technology education endorsement could comprise of an additional 15 credits that include the following content and pedagogical areas:

- Project- and problem-based learning;
- Engineering design, including 3D computer-aided design;
- Manufacturing and materials;
- Applied electronics; and
- STEM/engineering facilities design, safety, and management. (3 and 19 through 32)

Response: The Department declines to make the commenters' suggestion to change the content coursework requirements for the technology education endorsement. Educators need rigorous training in content and pedagogy. The amendments at N.J.A.C. 6A:9A-5.6

concentrate specifically on add-on endorsements for mathematics and science because the high-need areas require additional content knowledge aligned to mathematics and science coursework to meet the content requirement. Technology education is a specialized endorsement area that requires specific topics to be covered within a technology education educator preparation program. Requirements for the technology education endorsement at N.J.A.C. 6A:9B-10.6 include nuanced requirements and specific courses beyond the pathway designed for mathematics and science teachers at N.J.A.C. 6A:9A-5.6.

The 15-credit add-on science endorsement option at N.J.A.C. 6A:9B-10.4(b) is designed for educators already holding science certifications. There is no aligned technology education endorsement that could allow for a comparable add-on endorsement option for instructional certificate holders. The Department cannot approve a specific program plan in the context of a rulemaking.

25. Comment: The commenter contended that there is a nationwide teacher shortage of certified technology education teachers. The commenter stated that to solve this problem, institutions of higher education need to develop educator preparation programs for technology education. The commenter stated that there is only one higher education institution supporting technology education in New Jersey and offered the Department assistance in this area. The commenter stated that a technologically literate society is important and contended that more technology education teachers will inspire more students to be interested in teaching technology education. The commenter asserted that technology education teachers can improve students' technological literacy by teaching subjects and coursework, such as technology education, including power, energy control, transportation technology, engineering design, communication technology, and computer

science, and industrial arts, such as material processing, construction, manufacturing, CADD, and architecture. (4)

Response: The Department thanks the commenter for the support of technology education in New Jersey. The Department works to ensure that educator preparation program providers understand which endorsement areas are in high demand in New Jersey. The Department has not identified technology education as a shortage area in New Jersey based on the data utilized to develop the teacher shortage area list. Educator preparation program providers have the discretion to determine which programs to offer. Currently, there are two CEAS and nine CE educator preparation programs are approved to prepare technology education teachers.

26. Comment: The commenters contended that more needs to be done to save technology and engineering programs in kindergarten through grade 12 schools and to address the technology and engineering teacher shortage. The commenters suggested that the Department develop additional technology and engineering educator preparation pathways and career and technical education endorsements for technology education. The commenters stated that flexibilities at N.J.A.C. 6A:9A-5.6 allow educators to earn add-on endorsements for mathematics and the sciences, but there are no flexibilities in the high-need areas of technology and engineering education. The commenters also stated that schools could benefit from using art, science, and mathematics teachers in technology and engineering classrooms.

The commenters also requested the data on teacher shortage areas that the Department has stated it sends to colleges and universities. (5, 6, and 7)

Response: The Department declines to make the commenters' suggestion to create

additional educator preparation program pathways for technology education. The Department annually prepares the teacher shortage area list (<https://tsa.ed.gov/#/reports>), which is published by the U.S. Department of Education and informs teachers and teacher candidates of the potential to reduce, defer, or discharge student loan repayments. Using the Federally prescribed formula, technology education is not one of the identified shortage areas in New Jersey.

The amendments at N.J.A.C. 6A:9A-4.3(d)1 and 2 provide multiple options for a candidate to demonstrate basic skills proficiency, thereby allowing additional flexibilities to widen the teacher pipeline. The five-year limited CE/limited CEAS pilot program allows exemptions to the basic skills requirement for limited CE candidates that meet all other certification requirements and work in school districts that participate in the pilot program. The limited CE/limited CEAS is available for individuals seeking technology education endorsement. The Department will analyze data collected through the pilot program to determine the impact and, if necessary, make recommendations for future amendments in this area. These are two ways that the Department is trying to widen the teacher pipeline. These innovative flexibilities will help to widen the teacher candidate pool for individuals looking to enter the field, including candidates for technology education teaching positions.

27. Comment: The commenters suggested that the Department include technology and engineering education at N.J.A.C. 6A:9A-5.6 to create a technology and engineering add-on endorsement pathway similar to the proposals for mathematics and science. (5, 6, and 7)
- Response: The Department declines to make the commenters' suggested change. The amendments at N.J.A.C. 6A:9A-5.6 concentrate specifically on the add-on endorsements

for mathematics and science because these high-need areas only require additional content knowledge aligned to mathematics and science coursework to meet the content requirement. Technology education is a specialized endorsement area requiring specific topics be covered within a technology education educator preparation program. Requirements for the technology education endorsement at N.J.A.C. 6A:9B-10.6 include nuanced requirements and specific courses beyond the pathway designed for mathematics and science teachers at N.J.A.C. 6A:9A-5.6.

28. Comment: The commenter expressed support for the Men of Color Hope Achievers (MOCHA) program and expressed concerns regarding the process for placing participants. The commenter stated that a MOCHA participant reportedly was teaching at the start of the year, but removed because the participant did not yet hold an instructional certificate. (9)
Response: The Department appreciates the commenter's support of the MOCHA program. N.J.A.C. 6A:9B-5.1(a) requires any person employed as a teaching staff member by a district board of education to hold a valid and appropriate instructional certificate. In partnership with Rowan University, the Department closely supports MOCHA participants during the certification process and to ensure that participants meet the requirements for the instructional certificate and endorsements. The support provided includes test preparation, certification guidance, transcript review, testing vouchers, and mentoring. Some MOCHA participants earned substitute credentials to be able to temporarily serve in a classroom until all requirements for the instructional certificate were met.
29. Comment: The commenter opposed the State Program Approval Council at N.J.A.C. 6A:9A-3.2. The commenter stated that the diversity on the council takes away from a parent's input into their student's education. The commenter also stated that diversity

takes away from American values that were established in the U.S. Constitution. (10)

Response: The Department disagrees with the commenter. It is important that the State Program Approval Council members reflect the diverse population of New Jersey related to ethnicity, race, and gender to ensure that all educator preparation programs approved by the Commissioner meet the needs of the State.

Federal Standards Statement

The rules readopted with amendments and new rules will further align the chapter with the Federal Every Student Succeeds Act (P.L. 114-95), specifically Section 5 Supporting Excellent Educators (5.1 Educator Development, Retention and Advancement, 5.2 Support for Educators, and 5.3 Educator Equity) and will ensure that New Jersey's public-school system prepares students for postsecondary education and the 21st century workplace. The rules readopted with amendments and new rules are in compliance with both Federal regulations and statutes.

Full text of the readopted rules can be found in the New Jersey Administrative Code at N.J.A.C. 6A:9A.

Full text of the adopted amendments and new rules follows:

Text