

**Notice of Proposal Regarding Readoption with Amendments of N.J.A.C. 6A:9B,  
State Board of Examiners and Certification**

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

## **Education**

### **State Board of Education**

#### **State Board of Examiners and Certification Rules**

##### **Readoption with Amendments: N.J.A.C. 6A:9B**

**Adopted New Rules: N.J.A.C. 6A:9B-3.3, 7.7, 8.10, 10.15, 11.13, 11.14, 14.22, and 14.23**

**Adopted Repeals: N.J.A.C. 6A:9B-7.3, 10.8, 10.16, and 15.2**

Proposed: December 19, 2022, at 54 N.J.R. 2292(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.061, **with non-substantial changes** not requiring additional public notice and comment (see N.J.A.C. 1:30-6.3).

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

Effective Dates:        April 6, 2023, Readoption;  
                                 May 1, 2023, Amendments, Repeals, 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.        Jonathan Pushman, Director of Governmental Relations, New Jersey School Boards Association
2.        Debra J. Bradley, Esq., Director of Government Relations, New Jersey Principals and Supervisors Association

3. Kathleen J. Effner, Lead mathematics teacher, Parsippany High School
4. Gregory Murray, Bloomfield School District
5. Christine Drevitch, Washington Township School District
6. Ann Marie VanSickle, Director of Curriculum and Instruction, Lincoln Park School District
7. Michelle Wendt, Vice President, Computer Science Teachers Association of New Jersey (CSTANJ) and Technology Integration Specialist, Southern Regional Institute (SRI) and Education Technology Training Center (ETTC), Stockton University
8. Benjamin Isecke, President and Steering Committee member, Computer Science Teachers Association of New Jersey
9. Patricia Morreale, Ph.D., Professor and Chair, Department of Computer Science and Technology, Kean University
10. Daryl Detrick, Computer science teacher and Director, Computer Science Teachers Association of New Jersey
11. Stacie Ferrara, Ed.D., STEM and physical education supervisor, Neptune Township School District
12. Dr. Gail Verdi, Associate Professor, Coordinator TESOL Alt Route, Professional, and MA Programs, Kean University
13. Jessica Norworth, Mathematics and computer science teacher, Westfield High School
14. Ann-Marie Linz, Teacher, Watchung Hills Regional High School
15. Beth Ann Griller, Teacher, Holmdel School District
16. Regina Nadbielny, STEM teacher
17. Diana Baccash

18. Lisa DeVitis-Lang
19. Jennifer Aschettino, Supervisor of STEAM Integration and Future Ready Programs,  
North Brunswick Township School District
20. Sharon Spriggs, STEM technology teacher
21. Ann Moyle
22. Christopher Schama, Computer science teacher, Emerson Jr./Sr. High School
23. Laura Burke, Technology teacher, Berlin Township School
24. Renae Borgstrom, Berlin Township School District
25. Haim Cohen, Computer science teacher, East Brunswick High School
26. Alicia Testa, Computer science educator, Princeton Charter School
27. Sumi Hagiwara, Ph.D., Acting Associate Dean for Academic Affairs, College of  
Education and Human Services, Montclair State University
28. Beth Thomas, School library media specialist
29. Tricina Beebe, School library media specialist, Hainesport Township School District
30. Dina Boero
31. Nathan Henderson-James
32. 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
33. Samantha Kozar, Ed.D, New Jersey City University
34. Elisabeth Yucis, Associate Director, Professional Development and Instructional  
Issues, New Jersey Education Association
35. Mary Moyer Stubbs, Legislative consultant, New Jersey Association of School Librarians

36. Tamara Carr, School library media specialist
37. Sean P. Fallon, School library media specialist
38. Michelle McGreivey, Mentoring and New Members Committee Chair, New Jersey Association of School Librarians
39. Jackie Burke, Executive Director, New Jersey Council of County Vocational-Technical Schools
40. Melissa Eckstein, District career facilitator, Gateway Regional High School
41. Kathy Stanzione
42. Diane Wisniewski
43. Matthew Konowicz, Director of Instruction, Northern Burlington County Regional School District
44. Brian J. Drelick, Supervisor of STEM, High Point Regional High School
45. Nick Beykirch, Technology education teacher, William Annin Middle School, Bernards Township Public Schools
46. Chris Ireland, Supervisor of Visual and Performing Arts and Related Areas, Hillsborough Township Public Schools
47. Ron Lieberman, Principal, Banyan Elementary School
48. James Dunn, Supervisor of Curriculum and Instruction, Little Ferry Public Schools
49. A. Smith
50. Dave Janosz, Retired supervisor of technology education, Northern Valley Regional High School District
51. Ronald M. Durso, Supervisor of Technology Education, Fairlawn School District

52. Erica DeMichele, K-12 Supervisor of Science, Technology, Engineering, Sustainability and Co-STEM, Delran Township Public Schools
53. Ryan DelGuercio, Supervisor of Technology and Engineering Department/Dean of Students, West Orange High School
54. Kenneth McCarthy, Mathematics and computing teacher, North Arlington High School
55. Donna Montgomery, Middle school computer teacher
56. Jeannine Lanphear
57. Michael Meyer, Superintendent of Schools, Lincoln Park School District
58. Jesse Place
59. Christopher Shamburg, Ed.D., Professor and Coordinator of Doctoral Program in Educational Technology Leadership, Graduate Program in Educational Technology, New Jersey City University
60. Maria Filipe
61. Ellen Miller
62. Jacy L. Lance, Director of Public Affairs. Porzio Governmental Affairs on behalf of New Jersey Speech-Language Hearing Association
63. Danielle Dagounis, Director of Education, School District of the Chathams
64. Guida Faria, Supervisor of Science, Engineering and Gifted and Talented, Scotch Plains-Fanwood School District
65. John P. Pascale, Principal, Mahwah High School
66. Ryan Soule
67. Annamaria Bellino, Supervisor of World Languages, English as a Second Language and Family and Consumer Sciences, Cranford Public Schools

68. Marqueritha Clarke, Supervisor of Mathematics and Computer Science, Cliffside Park School District
69. Jean Public
70. Donna Montgomery, Computer teacher, New Jersey Education Association
71. Jason J. Barr, Dean, College of Education and Human Services, Rider University
72. Alan Gunneson, Teacher of applied technology, Westwood Regional High School
73. Matthew Ducker Duffy, Technology education teacher and Robotics Team advisor, Scotch Plains-Fanwood High School
74. Matt Potter, Technology education teacher, Bunker Hill Middle School, Washington Township School District
75. Laura Kinney, Technology education teacher, Washington Township Public Schools
76. Timothy Zavacki
77. Ryan Riess, Past President. New Jersey Technology and Engineering Association
78. Steven Whalen, Technology education teacher, Washington Township High School
79. Rebecca Rivera, Applied technology and STEM Teacher, Orange Avenue School, Cranford Public School District
80. Mike D'Ostilio, Principal, Bunker Hill Middle School
81. Amber Mariano Davis, Director of State Government Affairs, Code.org
82. Joan Cohen, Former Chairperson, New Jersey Registry for the Interpreters of the Deaf, New Jersey Department of Education; Project Coordinator, Educational Interpreter Professional Development Center (EIPDC); and adjunct professor, Rowan College Burlington County Interpreter Training Program
83. Margaret Renn, College of Education, William Paterson University

84. LaChan Hannon, Ph.D., Director of Teacher Preparation and Innovation, Rutgers University-Newark
  85. Ralph Shenefelt, Senior Vice President, Health and Safety Institute
  86. Stacey Leftwich, Ph.D., President, New Jersey Association of Colleges for Teacher Education
  87. 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
  88. Sue Young, New Jersey Association of School Business Administrators
  89. Rosie Taravella, Regional CEO, American Red Cross of New Jersey
  90. Elizabeth Hasner, President, New Jersey Registry for the Interpreters of the Deaf
  91. Ellen M. Pozzi, Ph.D, Director, School Library Media Specialist Program, William Patterson University
  92. Regina G. Appolon, Princeton Public Affairs Group, on behalf of the New Jersey Counselor Association
1. Comment: The commenter expressed support and appreciation for the following changes:
    - Basic skills requirement at N.J.A.C. 6A:9B-8.3(a)5 and 6A:9A-4.3(d);
    - Credentials for the career and technical education (CTE) endorsement in regulated occupations at N.J.A.C. 6A:9B-11.3(b)1;
    - Clinical practice requirements for interstate reciprocity for add-on endorsement at N.J.A.C. 6A:9B-8.8(a)1i;



- Interstate reciprocity for candidates without recent effective experience at N.J.A.C. 6A:9B-8.8(e);
- Streamlining and broadening degree or coursework requirements for school administrator and principal endorsements at N.J.A.C. 6A:9B-12.4(a)1ii and 12.5(a)1ii;
- CTE substitute credential requirements at N.J.A.C. 6A:9B-7.4(a)1;
- Exempting certificate of eligibility (CE) holders from rules governing approval and appointment of acting administrators at N.J.A.C. 6A:9B-13.1(a);
- Extending the duration of a noncitizen certificate at N.J.A.C. 6A:9B-5.7(a)1i;
- Coursework accepted to meet certificate of eligibility with advanced standing (CEAS) requirements at N.J.A.C. 6A:9B-6.1(b)3; and
- Expanding authorities of bilingual/bicultural education endorsement at N.J.A.C. 6A:9B-9.3(b)1. (1)

Response: The Department thanks the commenter for the support.

2. Comment: The commenter expressed support for N.J.A.C. 6A:9B-8A, which grants flexibilities regarding the grade point average (GPA) requirements to obtain a certificate. The commenter stated that the limited CE/limited CEAS pilot program will help attract more individuals to become teachers and promote a more diverse teacher workforce. (69)

Response: The Department thanks the commenter for the support.

3. Comment: The commenter expressed support for proposed amendments for the elementary school (K-6) endorsement at N.J.A.C. 6A:9B-10.2. The commenter stated that requiring an additional major did not prepare educators to teach in elementary school classrooms and negatively impacted the quality of teachers entering the field. The

commenter stated that preservice teachers should get more training to teach reading, writing, and mathematics since students are tested in these subjects. (49)

Response: The Department appreciates the commenter's feedback.

4. Comment: The commenters expressed support for the proposed amendments at N.J.A.C. 6A:9B-14.18, Educational interpreter. The commenters supported the proposed increase for Educational Interpreter Performance Assessment (EIPA) score to 3.5 from the existing 3.0. The commenters also supported the minimum requirement that candidates must meet one of the following:

- Passage of the EIPA written test and knowledge standards exam;
- A certificate of educational interpreting from an accredited two- or four-year college; or
- Complete 12 semester hour-credits in related content areas. (66 and 81)

Response: The Department thanks the commenters for the support.

5. Comment: The commenter requested changes at N.J.A.C. 6A:9B-4.2(a) to replace "crime or offense" with "criminal offense or unbecoming conduct." The commenter stated that "offense" is too broad and may encompass issues not deemed to be criminal, including issuance of a speeding ticket, minor traffic offense, and other low-level infractions that do not rise to the level of unbecoming conduct. The commenter contended that disclosure of low-level infractions should not jeopardize an educator's certificate and livelihood. The commenter stated that the requested change would align N.J.A.C. 6A:9B-4.2 with other sections of the chapter that reference "criminal offenses or unbecoming conduct." (2)

Response: The Department disagrees that the term "crime or offense" is too broad and that it needs to be changed to "criminal offense or unbecoming conduct." The Board of Examiners is not restricted to reviewing only criminal-based disclosures, like those

contained at N.J.S.A. 2C:1, the New Jersey Code of Criminal Justice. The Board of Examiners, review also includes serious offenses contained within motor vehicle laws at N.J.S.A. 39:1-1 et seq., including, but not limited to, driving while intoxicated (N.J.S.A. 39:4-50), driving while in possession of a controlled dangerous substance (N.J.S.A. 39:4-49.1), reckless driving (N.J.S.A. 39:4-96), and similar serious motor vehicle violations with consequences of magnitude that demonstrate a risk to the health, safety, and welfare of students. The amendments at N.J.A.C. 6A:9B-4.2(a) do not require or compel the Board of Examiners to act on a disclosure by a candidate. Rather, the disclosure will ensure that the Board of Examiners can follow up with a candidate on issues of educator conduct that impacts the health, safety, and welfare of students.

6. Comment: The commenter requested changes to the proposed amendment at N.J.A.C. 6A:9B-4.2(b) that permits a Board of Examiner's designee to review a candidate's criminal history disclosure. The commenter stated that the assignment of a designee to review a criminal history disclosure by candidates for a certificate is a practical necessity and the regulations should include the designee's qualifications to provide the service. (2)  
Response: The Department disagrees that N.J.A.C. 6A:9B-4.2 needs to be amended to include qualification or credentials for the Board of Examiner's designee reviewing criminal history disclosures. Including this level of information in the rules is overly prescriptive and unnecessary because the Board of Examiners formally reviews any final action against a certificate.
7. Comment: The commenter requested the Department delete the proposed amendments at N.J.A.C. 6A:9B-4.3(a)1 that require chief school administrators to disclose to the Board of Examiners all staff suspensions or the placement of staff on administrative leave. The

commenter stated that staff can be placed on administrative leave for accusations and, therefore, action against their certificates should await the outcome of a proceeding and not be based upon accusations. (2)

Response: The Department maintains that the amendments at N.J.A.C. 6A:9B-4.3(a)1 are necessary. The amendments do not require or compel the Board of Examiners to act on the chief school administrator's notification. Rather, the notification will ensure that the Board of Examiners can follow up with employing school districts, as appropriate, on issues of educator conduct that impacts the health, safety, and welfare of students.

8. Comment: The commenter stated that the reason for the proposed amendment at N.J.A.C. 6A:9B-4.3(a)2 is understandable but opposed the amendment because it may have the unintended impact of limiting schools from securing the services of volunteers. (2)

Response: The Department disagrees that the amendment, which requires a chief school administrator to report the resignation, retirement, or removal of a certificate holder who is accused of criminal offenses or unbecoming conduct and who works in a school building through a third-party vendor or as a volunteer, will reduce the service of volunteers. The amendment is an important safety measure to minimize the risk of an individual seeking employment or access to students in multiple public school buildings.

9. Comment: The commenter indicated support for the proposed amendment at N.J.A.C. 6A:9B-4.3(a)3, which requires the chief school administrator to notify the Board of Examiners when a certificate holder fails to maintain any license, certificate, or authorization that is mandated pursuant to this chapter for the holder to serve in a position, to replace "certificate holder" with "teaching staff member." (2)

Response: The Department appreciates the support.

10. Comment: The commenter expressed support for proposed new N.J.A.C. 6A:9B-4.3(c)3, which will require a certificate holder to report to the chief school administrator within seven days of a suspension or revocation of any other license, certificate, or authorization issued to the certificate holder by another state or Federal agency or body. (2)

Response: The Department appreciates the support.

11. Comment: The commenter expressed support for the proposed amendment at N.J.A.C. 6A:9B-4.5(a)4 to allow for the issuance of an order to show cause if the Board of Examiners receives notice that another state has taken action against a teaching staff member's certificate issued by that state when the teaching staff member also holds a certificate from New Jersey. (2)

Response: The Department appreciates the commenter's support.

12. Comment: The commenter expressed support for the proposed amendments at N.J.A.C. 6A:9B-9.3 and 11.10. The commenter stated that the proposed amendments more accurately align the endorsements and the related requirements. The commenter supported the Department's efforts in ensuring that well-trained professionals are providing quality instruction in swimming, diving, and water safety to the students of New Jersey. (89)

Response: The Department thanks the commenter for the support.

13. Comment: The commenter stated that many of the barriers to individuals entering the education field are archaic and have created a teacher shortage. The commenter also stated that the barriers must be removed, but the proposed amendments at N.J.A.C. 6A:9, 9A, 9B, and 9C are not sufficient to increase the pool of teaching candidates. The commenter further stated that the proposed amendments show a misunderstanding of, and a disconnect

to, the current staffing crisis in school districts. (87)

Response: The Department disagrees with the commenter's statements that the amendments at N.J.A.C. 6A:9, 9A, 9B, and 9C are not sufficient to remove barriers to entry into the teaching field. The amendments create additional pathways and opportunities for individuals to meet certification and endorsement requirements. The amendments offer add-on endorsement opportunities, streamlined reciprocity rules, and address mentoring and professional development for new and novice teachers. The amendments will increase the educator pool while maintaining educator standards and quality.

14. Comment: The commenter opposed the proposed amendment at N.J.A.C. 6A:9B-4.6(b) that will require certificate holders to address each accusation in detail to provide adequate information for the Board of Examiners to decide on the suspension or revocation of a certificate. The commenter stated that the proposed amendment will duplicate existing requirements. The commenter also stated that the proposed amendment may lead to questions as to how specific the denial must be. The commenter further stated that the specific denial to an accusation should suffice, as it does when answering complaints filed in Superior Court. (2)

Response: The Department disagrees that requiring certificate holders to provide a specific denial when responding to an order to show cause is duplicative. The amendment clarifies the requirement and expectations for certificate holders when submitting an answer. Further, the amendment at N.J.A.C. 6A:9B-4.6(b) codifies the Board of Examiners' current process to request that all certificate holders provide a specific denial to each numbered paragraph in the order to show cause.

15. Comment: The commenter expressed support for the proposed amendments at N.J.A.C. 6A:9B-4.6(e), which will eliminate the requirement to submit 18 copies of all response papers in favor of electronic submissions. (2)

Response: The Department appreciates the support.

16. Comment: The commenter expressed concern regarding the potential impact of proposed new N.J.A.C. 6A:9B-4.7(d). The commenter contended that the proposed regulation will permit the Board of Examiners to issue a suspension pending the outcome of a criminal matter and does not address what happens if the underlying criminal proceeding results in a dismissal. The commenter also requested clarification regarding the process when the underlying criminal offense results in a dismissal. (2)

Response: If a criminal charge or indictment does not result in a conviction, the Board of Examiners vacates the suspension upon receipt of appropriate documentation indicating dismissal or other adjudication of not guilty. The certificate holder is responsible for notifying the Board of Examiners of the outcome so the appropriate action can be taken.

17. Comment: The commenter contended that existing N.J.A.C. 6A:9B promotes over-specialization in particular areas. The commenter stated that previous certificate regulations allowed for more flexibility that permitted teachers with certain certificates to teach in several grade spans and in a broader range of content. The commenter recommended the Department reinstitute, and/or clarify through regulation, that staff members with certain endorsements can appropriately teach a broader range of courses within a defined subject area. The commenter stated that increased flexibilities could free up harder-to-find teachers in certain subject areas, like physics, and can broaden the scope of certain key teachers, like teachers of students with disabilities who are permitted to cover multiple grade levels and

settings in special education. The commenter recommended that the Department explore endorsement areas that may benefit from flexibility as both short- and long-term solutions to chronic teacher shortage areas. (2)

Response: The Department agrees with the commenter and maintains that the readoption with amendments of N.J.A.C. 6A:9, 9A, 9B, and 9C meet those goals. New N.J.A.C. 6A:9B-11.9(d) and (e) will add 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 endorsements and provide more flexibility for school districts in placing educators in middle-grade classrooms.

However, the Department declines the commenter's suggestion to expand grade levels and content areas for certain endorsement areas, as broadening the scope may not be beneficial to students if educators are not appropriately trained in the area in which they will be teaching. Endorsement requirements are based on the specific knowledge and skills necessary to serve in the respective classrooms. Requirements and authorizations that exist for each endorsement area are nuanced and intentional and vary based on the specific subject area and grade level. The amendments at N.J.A.C. 6A:9B-10.4 and 11.13 will create add-on endorsement pathways for mathematics and science to allow certified teachers to gain additional endorsements to expand the content areas they are able to teach.

18. Comment: The commenter asked whether new N.J.A.C. 6A:9B-4.7(d) will result in the Board of Examiners publishing the reinstatement of a certificate with the underlying facts if a suspended certificate holder was not convicted of the pending criminal charges. The commenter expressed concern about the potential damage to a teaching staff member's



reputation, especially where a frivolous claim is brought against the staff member. (2)

Response: If a suspension order is vacated, the Department removes it from publication.

19. Comment: The commenter sought clarification regarding new N.J.A.C. 6A:9B-4.16(a)3, which will require the Board of Examiners to meet to hear the motion to stay the action against a certificate within 20 days of the date the motion is filed. The commenter asked how an employer will know when the Board of Examiners reviews the motion. (2)

Response: The new regulation will require the Board of Examiners to notify the moving party of the decision within five days of reviewing the motion and any opposition.

Accordingly, the impacted certificate holder will have the necessary information to advise an employer of the matter's status. Additionally, school district officials can contact the Board of Examiners through electronic mail or telephone with questions regarding the status of a certificate holder's motion.

20. Comment: The commenter opposed proposed new N.J.A.C. 6A:9B-4.16(a)3 because the Board of Examiners should be required to issue a written decision within a specified time frame after receipt of the motion and any opposition, and not after it reviews the motion. The commenter stated that any decision on a motion to stay — whether it is granted or denied — should be in writing. (2)

Response: The new regulation will require the Board of Examiners to notify the moving party of the decision within five days of reviewing the motion and any opposition.

Removing the requirement for a formal written decision provides the certificate holder with a more expeditious response and consideration of the motion. The Board of Examiners will include, in the written notification, information on the basis for the decision to grant or deny the motion.

21. 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. (61)
- 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.
22. Comment: The commenter recommended that the Department consider waiving certificate fees for candidates who cannot afford them by setting a financial standard and charging only one fee, regardless of the number of certificates sought. The commenter stated that the Department should assist individuals who are interested in joining the profession due to the current teacher shortage. (2)
- Response: Certificate fees set forth at N.J.A.C. 6A:9B-5.6 offset the cost of salaries of Department staff who process certificate applications and for related certification office operational needs. Governor Murphy's Fiscal Year 2024 budget proposal released in February 2023 includes provisions to fund the Department's certification staff and operations and waive certification fees.

23. Comment: The commenter recommended an exploration and expansion of endorsement areas similar to flexible endorsements of the past, such as “teacher of the handicapped” and teacher of general science, that allowed teachers who hold the endorsements to teach in several grade spans and in broader content areas. The commenter stated this could be both a short- and long-term solution to chronic teacher shortage areas. The commenter commended the Department for its innovative strategy of creating “add-on endorsements” at N.J.A.C. 6A:9B-5.6 in mathematics and science. The commenter asked why the Department did not expand similar opportunities into other areas. The commenter stated the shortage areas go beyond special education, bilingual/bicultural education, mathematics, and science. The commenter also stated that new strategies in all teaching areas are necessary to meet student needs. (2)

Response: The amendments at N.J.A.C. 6A:9B-5.6 concentrate specifically on the add-on endorsements for mathematics and science because the two 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 CTE 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 has proposed

additional certificate 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. New N.J.A.C. 6A:9B-11.9(d) and (e) will create two new middle school with subject-matter specialization endorsements in 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.

24. Comment: The commenter recommended removing the requirement for teacher candidates to have a Social Security Number to obtain a certificate. The commenter stated that undocumented students attend New Jersey public schools, colleges, and universities and receive financial aid to complete educator preparation programs but are unable to enter the teaching profession without a Social Security Number. The commenter further stated that even though there is a pathway for non-citizens to become certified, the Social Security Number has become a barrier for people who are undocumented to pursue economic mobility when seeking teaching, nursing, and counseling licenses in New Jersey. The commenter recommended expanding acceptable forms of identification like issuing an “access number.” The commenter stated that removing this barrier would expand the cultural and linguistic diversity of New Jersey teachers to meet the cultural and linguistic needs of preschool through grade 12 students. The commenter also stated that it would create a pathway for undocumented students who complete educator preparation programs to be eligible for certification. (85)
- Response: The Department declines to adopt the commenter’s recommendation, as it would be contrary to State law. N.J.S.A. 18A:26-1 and N.J.A.C. 6A:9B-5.7 require

teaching staff members to be citizens of the United States or citizens of other countries who have declared intentions of becoming United States citizens. Individuals who do not have Social Security Numbers are ineligible for employment and ineligible for certification. N.J.A.C. 6A:9B-5.7 and 5.14 offer teaching certification pathways for noncitizens. The limited certificate for noncitizen teachers enables non-citizens to teach for up to three years, if they have met the conditions at N.J.A.C. 6A:9B-5.14.

25. Comment: The commenter expressed concern regarding the proposed amendments at N.J.A.C. 6A:9B-5.7, Citizenship requirement. The commenter asserted that the Department should not encourage foreign citizens to work in New Jersey schools and those jobs, instead, should be given to United States citizens. (69)

Response: The Department encourages all who have the qualifications, drive, and commitment to education to seek employment in New Jersey schools, regardless of an individual's country of origin. In accordance with existing N.J.A.C. 6A:9B-5.7 and N.J.S.A. 18A:26-1, any citizen of another country who has declared the intention of becoming a United States citizen and who is otherwise qualified may be granted, with the Commissioner's approval, a teaching certificate for employment as a teacher by a district board of education.

26. Comment: The commenter asserted there is no reason to update terminology at N.J.A.C. 6A:9B-5.14, Limited certificate for foreign teachers. The commenter stated that "foreign" should not be replaced with "noncitizen" since they are not United States citizens. (69)

Response: The Department disagrees with the commenter regarding the need to replace "foreign" with "noncitizen." The amendment will align the section with current terminology for recognizing citizens from other countries.

27. Comment: The commenter stated that many of the barriers to individuals entering the education field are archaic and have created a teaching shortage. The commenters requested that the Department amend N.J.A.C. 6A:9B-7.1(a) through (f) to expand the amount of time the holder of a substitute credential can serve in a teaching assignment above 20 days in assignment or 40 days with executive county superintendent approval. The commenter also suggested amending N.J.A.C. 6A:9B-7.4 to increase the 40-day service limit for CE and CEAS holders serving as substitute teachers in classrooms outside of the subject area of the certificate held with notice to the executive county superintendent or parents. (87)

Response: The Department declines the commenter's suggestion to amend N.J.A.C. 6A:9B-7.1 and 7.4. The authorizing statute, N.J.S.A. 18A:16-1.a through d, sets forth how long the holder of a substitute credential can serve, and the rules cannot exceed the statutory limits. Currently, individuals holding a substitute credential can serve in the same classroom for up to 20 consecutive school days. However, school districts can hire individuals holding CEs, CEASs, or standard certificates to serve as substitute teachers in the same classroom for up to 60 days. The law also authorizes executive county superintendents to grant extensions to the service limits on a case-by-case basis when school districts provide a rationale for being unable to hire a teacher to fill a position. The Department does not promote use of long-term substitutes to address teacher shortage areas, except for instances when an assigned classroom teacher cannot work for an extended period due to illness or other factors.

28. Comment: The commenter disagreed with proposed new N.J.A.C. 6A:9B-7.2(b), which will reduce to 30, the number of credits required for the substitute credential. The

commenter recommended maintaining the existing 60 semester-hour credits for the substitute credential until, at least, the Commissioner has published the report required pursuant to N.J.S.A. 18A:26-2.29. (1)

Response: The Department disagrees with the commenter regarding the reduction of credits to 30 from 60 for the substitute credential at N.J.A.C. 6A:9B-7.2(b), as well as the suggestion to maintain the existing 60 semester-hour credits until the Commissioner has published the required report. The new subsection is necessary to codify provisions at N.J.S.A. 18A:26-2.29 that provided an alternative substitute pathway due to the substitute teacher shortage caused by the COVID-19 public health emergency. The Department has issued the 30 semester-hour credit substitute credential to more than 500 candidates, which demonstrates support and interest in this credential. To address the need for substitute teachers, the Department proposes to indefinitely codify this pathway. The reduction in credit requirements will increase the opportunities for prospective teachers to work in a school setting because college students will be able to substitute teach earlier in their college experience. The alternative pathway established in statute is available to candidates only until June 30, 2023, whereas the proposed rule will codify the reduction of credit requirements for all candidates.

29. Comment: The commenter suggested that substitute teachers be allowed to lead classrooms for a month at a time to reduce the teacher shortage. (69)

Response: The Department disagrees with the commenter's suggestion that substitute teachers be utilized to reduce the teacher shortage. N.J.S.A. 18A:16-1.a through d sets forth how long the holder of a substitute credential can serve. Currently, individuals holding a substitute credential can serve in the same classroom for up to 20 consecutive

school days. However, school districts can hire individuals holding CEs, CEASs, or standard certificates to serve as substitute teachers in the same classroom for up to 60 days. The law also authorizes executive county superintendents to grant extensions to the service limits on a case-by-case basis when school districts provide a rationale for being unable to hire a teacher to fill positions. The Department does not promote use of long-term substitutes to address teacher shortage areas, except for instances when an assigned classroom teacher cannot work for an extended period due to illness or other factors.

30. Comment: The commenter requested that the Department amend N.J.A.C. 6A:9B-8.2 to eliminate the Commissioner-approved performance-based assessment because it is an archaic barrier to individuals entering the education field and the assessment has contributed to the teacher shortage. (87)

Response: On December 16, 2022, Governor Murphy enacted P.L. 2022, c. 129, which prohibits the State Board of Education from requiring the completion of a Commissioner-approved performance-based assessment for certification. The Department is implementing the law, which took effect immediately, as intended and the Commissioner-approved performance-based assessment is no longer required of CEAS nor CE candidates; rather, the educator preparation program must ensure that teacher candidates demonstrate pedagogical skills while completing the program. The Department intends to promulgate rules through a separate rulemaking, offer guidance, and support educator preparation programs and educators as the law continues to be implemented. Therefore, the Department declines the commenter's suggestion to amend N.J.A.C. 6A:9B-8.2 at this time.



31. Comment: The commenter thanked the Department for engaging in several stakeholder meetings with organizations that recognize the urgent need for rule revisions to alleviate the ongoing teacher shortages and inequities. The commenter stated that some of the proposed amendments may exacerbate, rather than alleviate, the teacher shortage, in general, and the shortage of teachers of color, in particular.

The commenter requested an amendment at N.J.A.C. 6A:9B-8.2(a)6 to state that the performance-based assessment of teaching be approved by the educator preparation programs instead of the Commissioner, as in the existing regulation, and to allow a CEAS candidate to pass the performance-based assessment or meet criteria at N.J.A.C. 6A:9B-8.2(c)3. The commenter also requested a new rule at N.J.A.C. 6A:9B-8.2(c)3 to permit a candidate with a cumulative GPA of at least 3.5, or whose State test of subject matter knowledge exceeds the passing score by at least 10 percent, to meet the requirements at N.J.A.C. 6A:9B-8.2(a)6. (86)

Response: The Department appreciates the commenter's support for the stakeholder engagement. The Department disagrees that the amendments exacerbate the teacher shortage, in general, and for teachers of color, in particular. The amendments offer add-on endorsement opportunities and streamlined reciprocity rules, and address mentoring and professional development for new and novice teachers.

The Department disagrees with the commenter's proposed amendments at N.J.A.C. 6A:9B-8.2(a)6 and (c)3. On December 16, 2022, Governor Murphy enacted P.L. 2022, c. 129, which prohibits the State Board of Education from requiring the completion of a Commissioner-approved performance-based assessment for certification. This law, which became effective immediately, addresses the commenter's suggestion to allow educator preparation programs to determine the appropriate performance assessment for each program.

An amendment at N.J.A.C. 6A:9B-8.2(a)6 is unnecessary at this time because the Department is implementing the law as intended and the Commissioner-approved performance-based assessment is no longer required of CEAS nor CE candidates; rather, the educator preparation program must ensure that teacher candidates demonstrate pedagogical skills while completing the program. The Department intends to promulgate rules through a separate rulemaking, offer guidance, and support educator preparation programs and educators as the law continues to be implemented.

The Department disagrees with the commenter that a new rule at N.J.A.C. 6A:9B-8.2(c) is necessary to permit a candidate with a cumulative GPA of at least 3.5, or whose State test of subject matter knowledge exceeds the passing score by at least 10 percent, to meet the Commissioner-approved performance assessment requirements, because the assessment is no longer a requirement pursuant to P.L. 2022, c. 129. As candidate performance will be assessed at the educator preparation program level, educator preparation program providers will make decisions regarding the passing standard and necessary flexibility.

32. Comment: The commenter requested that the Department amend N.J.A.C. 6A:9B-8.3 to eliminate the basic skills test requirement because it is an archaic barrier to individuals entering the education field and the assessment has contributed to the teacher shortage. The commenter stated that the basic skills test is the number one pipeline issue that has caused the closing of certificate-specific educator preparation programs. The commenter stated that, according to the National Council on Teacher Quality, there is a 33 percent failure rate for all elementary level teacher candidates and a 22 percent of basic skills test takers do not achieve the required score the first time, do not retake the test, and never enter the profession. Further, the commenter cited that 32 percent of basic skills test

takers who are of color do not achieve the required score the first time, do not retake the test, and never enter the profession. (87)

Response: The Department disagrees that N.J.A.C. 6A:9B-8.3 should be amended to eliminate the basic skills test requirement. The Department has created additional flexibilities for individuals to meet the basic skills requirements. For example, the amendment at N.J.A.C. 6A:9B-8.3(a)5i(1) replaces “approximately equal to the top-third percentile score” with “the top-half percentile score” for SAT, ACT, and GRE. The amendment at N.J.A.C. 6A:9B-8.3(a)5ii allows a candidate for a CE to demonstrate proficiency in the use of the English language and/or mathematics by holding a master’s or terminal degree with a minimum GPA of 3.0 from an accredited institution of higher education. The amendments will increase the educator pool while maintaining educator standards and quality.

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

33. Comment: The commenter requested the Department amend N.J.A.C. 6A:9B-8.8 to allow the Department to issue a standard certificate to any individual moving to New Jersey who has five or more years of teaching experience from any state. (87)

Response: The Department declines to adopt the suggested amendment at N.J.A.C.

6A:9B-8.8 because it is unnecessary. Existing reciprocity rules at N.J.A.C. 6A:9B-8.8(d) allow teachers holding standard certificates issued by other states with effective teaching experience to become certified in New Jersey. Furthermore, the amendments at N.J.A.C. 6A:9B-8.8 create additional pathways and opportunities for individuals to meet certificate requirements. For example, N.J.A.C. 6A:9B-8.8, as amended, eliminates redundant requirements for out-of-State candidates seeking reciprocity for bilingual/bicultural and teacher of students with disabilities endorsements.

34. Comment: The commenter commended the proposals to eliminate the clinical practice requirement for certified teachers from other states in the endorsement areas of bilingual/bicultural education and teachers of students with disabilities. The commenter suggested that the same flexibility be extended to other endorsement areas, where appropriate. (2)

Response: The Department appreciates the commenter's support for the amendments at N.J.A.C. 6A:9B-8.8(a)1. The Department has determined that it would not be necessary to expand this flexibility to other content areas. The reciprocity amendments at N.J.A.C. 6A:9B-8.8(a)1 impact only bilingual/bicultural and teachers of students with disabilities endorsements because the clinical practice component was duplicative for these add-on endorsement areas. Individuals seeking reciprocity in these areas have already completed clinical practice in their initial endorsement area. Therefore, the clinical practice component created a barrier specifically to the bilingual/bicultural and teachers of students with disabilities endorsements.

35. Comment: The commenter stated that approved private schools for students with disabilities (APSSD) have been impacted by the teacher shortage. The commenter also

stated that APSSDs employ paraprofessionals who are prepared to move into teaching but have trouble passing the basic skills test requirement and the candidates are not eligible for the pilot program that allow for exceptions to the basic skills requirements. The commenter contended that it appears discriminatory toward schools that serve the needs of the State's most fragile students. (47)

Response: The Department has implemented measures to help widen the teacher pipeline and to offer greater flexibilities in meeting certification requirements as authorizing statutes permit. P.L. 2021, c. 224 (N.J.S.A. 18A:26-2b et seq.), created the limited CE/limited CEAS pilot program to allow limited certificate holders to work only in school districts, charter schools, or renaissance schools. The State statute did not authorize holders of the limited CE or limited CEAS to work in APSSDs; therefore, the implementing rules at N.J.A.C. 6A:9B-8A do not allow holders of a limited CE or limited CEAS to teach in APSSDs.

36. Comment: The commenter expressed support for the Department's proposal at N.J.A.C. 6A:9B-8A to 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 education requirements. The commenter stated that many of the individuals end up working as substitutes or paraprofessionals. The commenter suggested that the Department continue to offer flexibilities in meeting the GPA requirements to increase the diversity of classroom teachers. (61)

Response: Existing N.J.A.C. 6A:9B-8A sets forth the rules for the five-year limited CE/limited CEAS pilot program pursuant to N.J.S.A. 18A:26-2b et seq. The Department will collect and analyze data from the pilot program in accordance with the law.

The amendments at N.J.A.C. 6A:9B-4.3(d)1 and 2 also will provide multiple options for a CEAS 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 existing flexibilities offer great potential to widen the teacher pipeline.

37. Comment: The commenter recommended replacing, at proposed new N.J.A.C. 6A:9B-9.2(a)7, the grade-span authorization from preschool through grade 12 for a teacher of computer science with grades nine through 12. The commenter contended that the change would be consistent with N.J.S.A. 18A:26-2.26.a. The commenter also recommended that the Department require individuals to either meet the qualifications that currently authorize an individual to teach computer science or the new computer science endorsement to teach computer science in preschool through grade eight after July 1, 2027. The commenter stated that proposed new N.J.A.C. 6A:9B-10.15(c), which will require a teacher to have been teaching computer science as of September 1, 2024, to take advantage of the pathway for a computer science endorsement, is unnecessarily restrictive. The commenter suggested revising proposed N.J.A.C. 6A:9B-10.15(c) to match more closely the minimum requirements at N.J.S.A. 18A:26-2.26.c. (1)
- Response: New N.J.A.C. 6A:9B-10.15 will provide three pathways for candidates to obtain the computer science endorsement. New N.J.A.C. 6A:9B-10.15(c) will enable experienced computer science teachers to demonstrate effectiveness in teaching computer science along with computer science content knowledge by passing the necessary content knowledge assessment without completing additional content coursework. With the ever-

changing nature of computer science, the Department will honor recent teaching experience in lieu of content coursework to satisfy this requirement. Candidates seeking the computer science endorsement without recent teaching experience can pursue one of the other two pathways, which do not require teaching experience to obtain the endorsement.

New N.J.A.C. 6A:9B-10.15 provides multiple pathways for earning the computer science endorsement. The proposed rules adhere to the minimum requirements at N.J.S.A. 18A:26-2.26, including requiring 15 content credits for a certified teacher to add the computer science endorsement and honoring computer science teaching experience in lieu of coursework. In addition to the pathway to add on the computer science endorsement, the proposed rules also create a pathway to earn an initial instructional certificate with the computer science endorsement that is closely aligned to other instructional content area endorsement requirements, including 30 content credits. Allowing multiple pathways to earn the endorsement broadens the pool of potential educators to serve in this area.

38. Comment: The commenter expressed concern that proposed N.J.A.C. 6A:9B-9.2(a)7, is too restrictive for current computer science teachers and that they will be unable to continue teaching after July 1, 2027. The commenter suggested that the Department amend proposed N.J.A.C. 6A:9B-9.2(a)7 so it is similar to N.J.A.C. 6A:9B-9.2(a)3 and would grandfather educators already teaching computer science by allowing them to demonstrate that they have the necessary content knowledge. (58)

Response: The Department disagrees with the commenter that N.J.A.C. 6A:9B-9.2(a)7 is too restrictive for current computer science teachers and that they will be unable to

continue teaching after July 1, 2027. Certificate holders already teaching computer science will have to complete minimal requirements to obtain the new endorsement.

Pursuant to N.J.A.C. 6A:9B-10.15(c), candidates for the computer science endorsement who hold a standard certificate and currently teach computer science as of September 1, 2024, will be eligible for the new endorsement if they receive two effective or highly effective ratings in teaching computer science in the last four years and pass the appropriate State test of computer science content knowledge.

39. Comment: The commenter stated that teachers certified in only English language arts are not qualified to manage a theater course. (42)

Response: Existing N.J.A.C. 6A:9B-9.3(a)3 rules do not allow the holder of an instructional certificate with an English language arts endorsement to teach theater.

40. Comment: The commenter requested that the Department amend N.J.A.C. 6A:9B-9.3(a)7 and (b)6iv to allow a teacher of the deaf to teach American sign language (ASL), as one way to eliminate an archaic barrier to the teaching profession. (87)

Response: The Department declines the commenter's suggestion to amend N.J.A.C.

6A:9B-9.3(a)7 and (b)6iv to allow a teacher of the deaf to teach ASL because the teacher of the deaf or hard-of-hearing for sign language communication endorsement differs greatly from the world language endorsement. ASL is a world language. According to N.J.A.C. 6A:9B-9.3(b)6iv, deaf or hard-of-hearing for sign language communication endorsement falls under the teacher of students with disabilities endorsements and authorizes the holder to teach deaf or hard-of-hearing students using sign language communication strategies. N.J.A.C. 6A:9B-9.3(a)7 sets forth the world languages that an endorsement holder can teach including ASL. The two endorsement types have different authorizations and



requirements. A teacher of the deaf or hard-of-hearing for sign language communication is proficient in ASL but is not trained on second language acquisition and related methodology as required of world language teachers. Teachers of the deaf and hard-of-hearing for sign language communication are content experts trained to deliver instruction to students with special needs. Teachers are trained in alignment with the authorizations and expectations of the role in which the endorsement holder will serve. ASL world language teachers provide world language instruction to students in kindergarten through grade 12, while teachers of the deaf or hard-of-hearing for sign language communication teach content like mathematics, science, and social studies to students who are deaf or hard-of-hearing. The roles and endorsements are not interchangeable. N.J.A.C. 6A:9B does not prohibit a teacher from seeking both endorsements.

41. Comment: The commenter supported the proposed amendment at N.J.A.C. 6A:9B-9.3(b)1 because it recognizes that holders of a bilingual/bicultural endorsement provide consultative services and supportive resource programs, including curriculum modifications, for English language learners (ELLs) and English as a second language (ESL) students at all grade levels. The commenter expressed concern that the proposed amendment will increase the difficulty that school districts experience in hiring paraprofessionals to work in bilingual/ELL programs. The commenter recommended that school districts provide professional development programs to enhance the skills of paraprofessionals working in this area, as appropriate in the school district. The commenter urged the Department to develop new strategies to incentivize qualified candidates to pursue careers in world languages and ESL/ELL education roles. (2)

Response: The Department thanks the commenter for the support of the amendment at

N.J.A.C. 6A:9B-9.3(b)1. The Department disagrees that the amendment will increase the difficulty that school districts experience in hiring paraprofessionals to work in bilingual/ELL programs because the Department proposed amendments at N.J.A.C. 6A:9B-9.3(b)1 to expand the allowable responsibilities of individuals holding a bilingual/bicultural endorsement. The Department also proposed, at N.J.A.C. 6A:9B-14.22, a bilingual language paraprofessional credential that acknowledges the work of bilingual paraprofessionals and will provide a role to further support bilingual students in classrooms, thereby increasing students' access to content and instruction. The Department collaborates with school districts to develop strategies for recruitment of world languages and bilingual/ELL educators. The Department agrees that school districts can provide professional development to paraprofessionals working in bilingual/ELL programs, if appropriate.

42. Comment: The commenter stated that many of the barriers to individuals entering the education field are archaic and have created a teaching shortage. The commenter requested the Department amend N.J.A.C. 6A:9B-9.4 and 10.10 to eliminate the family and consumer sciences endorsement or enable other endorsement holders to teach family and consumer sciences courses. The commenter also stated that there is a lack of family and consumer sciences educator preparation programs in the State. (87)

Response: The Department declines the commenter's suggestion to amend N.J.A.C. 6A:9B-9.4 and 10.10 to eliminate the family and consumer sciences endorsement or enable others to teach family and consumer sciences courses. Pursuant to N.J.A.C. 6A:8-5.1, the high school graduation requirements include at least five credits in 21<sup>st</sup> century life and careers, or career-technical education. Family and consumer sciences courses are

aligned to New Jersey Student Learning Standards (NJSLS) Standard 9 and are taught by teachers with a family and consumer sciences endorsement. Therefore, neither the courses nor endorsements can be eliminated.

The Department works closely with educator preparation programs to share data regarding high-need subject areas. However, educator preparation programs have the discretion to determine the programs developed and offered.

43. Comment: The commenter stated that the devastating teacher shortages require immediate action to address certification challenges and the lack of educator candidates. The commenter suggested that the Department address multiple endorsements, including the development of a standalone bilingual/bicultural endorsement, reinstatement of a comprehensive science endorsement, reinstatement of the K-8 endorsement, as well as endorsements for mathematics, school library media specialists (SLMS), CTE, world languages, and English as a second language. (87)

Response: The Department disagrees with the commenter's statements. The amendments at N.J.A.C. 6A:9B will create additional pathways and opportunities for individuals to meet certification and endorsement requirements. The amendments offer add-on endorsement opportunities, streamline reciprocity rules, and address mentoring and professional development for new and novice teachers. The amendments will increase the educator pool while maintaining educator standards and quality.

The Department declines the commenter's suggestion to make the bilingual/bicultural endorsement a standalone endorsement because the amendment at N.J.A.C. 6A:9B-9.3(b)1 will broaden the authorizations for the bilingual/bicultural endorsement. The Department also proposed, at N.J.A.C. 6A:9B-8.8(a)1, to streamline

reciprocity requirements for out-of-State teachers by eliminating the redundant clinical practice requirement. Additionally, certificate holders can obtain a CE with the bilingual/bicultural endorsement without completing additional coursework, which usually is completed gradually during a teacher's provisional period.

The Department declines the commenter's suggestion to reinstate the elementary education K-8 endorsement because there is a separate minimum level of content knowledge necessary to teach middle grades. However, the Department proposed amendments that offer options for elementary school and middle school teachers to add endorsements to broaden the scope of courses they can teach to address school districts' staffing concerns. New N.J.A.C. 6A:9B-11.9(d) and (e) will add two new middle school with subject-matter specialization endorsements in science, technology, engineering, and mathematics (STEM) and humanities. The new endorsements broaden the existing middle school endorsements and provides more flexibility for the school districts in placing educators in classrooms.

The Department declines the commenter's suggestion to reinstate the comprehensive science endorsement because content knowledge in each specific science area is necessary to adequately teach each subject. However, amendments at N.J.A.C. 6A:9B-10.4(b) will create pathways for teachers holding science endorsements to add additional science endorsements by taking 15 content credits instead of 30 content credits. The amendments acknowledge the overlap among the sciences while addressing the need to expand the pool of science educators.

44. Comment: The commenter requested that the Department restore the former family and consumer science endorsement because they are important life skills. The commenter

contended that several New Jersey colleges and universities are able to offer the content coursework for the endorsement area, but candidates must attend CE educator preparation programs when earning the content programs. The commenter also contended that school districts in New Jersey attempt to fill vacancies with candidates who attended colleges or universities from outside New Jersey and lead to a family and consumer science certificate. The commenter stated that this practice results in vacancies that cannot be filled and in canceled programs. (46)

Response: The Department did not propose to eliminate the family and consumer sciences endorsement options. The Department continues to offer the following four endorsements to the instructional certificate:

- Family and consumer sciences (1705);
- Family and consumer sciences: apparel, textiles, and interiors (1708);
- Family and consumer sciences: child and family development (1706); and
- Family and consumer sciences: foods/nutrition and food science (1707).

Additionally, the Department offers two different pathways for candidates to earn family and consumer sciences endorsements. Candidates for the endorsements may earn either an instructional CEAS or a CE with a family and consumer sciences endorsement. Pursuant to N.J.A.C. 6A:9B-9.4, holders of any of the family and consumer sciences endorsements may teach in grades preschool through grade 12, including approved CTE programs. The Department does not place limitations on New Jersey colleges and universities that seek to offer family and consumer sciences educator preparation programs. Colleges and universities have the discretion to determine how to align their educator preparation programs to the Department's certificates and endorsements, subject

to Commissioner approval. The Department continually collaborates with colleges and universities to expand educator preparation program offerings according to needs identified by data and school district input.

45. Comment: The commenter questioned the deletion at N.J.A.C. 6A:9B-9.4(c)7 of foreign service in the government and public administration endorsement in the CTE cluster. The commenter stated that careers in foreign service often entail working for the Federal government and that the proposed deletion does not make sense in the interconnected global society. (2)

Response: The Department proposed at N.J.A.C. 6A:9B-9.4(c)7 to delete “foreign service” because the CTE career cluster prepares students for careers in state and Federal government, which includes careers in foreign service. Therefore, the Department proposed removal of redundant terminology.

46. Comment: The commenter stated that proposed amendments at N.J.A.C. 6A:9B-10.2 will allow candidates for the elementary school (K-6) endorsement to major only in elementary education and to take 30 credits in liberal arts without completing enough courses to earn a traditional major. The commenter stated that the proposal is an inadequate way to meet the demand for teachers. The commenter also stated that most teachers who have left the profession have done so because of teaching has become an increasingly difficult and poorly remunerated profession and not because of the requirement to have a double major. The commenter expressed concern that the proposed amendments would reduce the quality of teacher training without fixing the problems that are causing the teacher shortage. The commenter urged the Department not to implement the proposed amendments and to consider the double major requirement to be part of what makes New Jersey schools strong. (30)

Response: The Department disagrees with the commenter and declines to make the commenter's suggestion. Existing N.J.A.C. 6A:9B-10.2 does not require a double major to earn the elementary school (K-6) endorsement. Colleges design degree programs and have the discretion to create an elementary education major that could lead to the elementary school (K-6) endorsement (for example, a bachelor of arts in elementary education), or to require individuals seeking a CEAS with an elementary school (K-6) endorsement to major in another area for degree completion and complete the necessary elementary education coursework (for example, a bachelor of arts in English plus requisite elementary education courses). The amendments at N.J.A.C. 6A:9B-10.2 will allow for a combination of content knowledge and pedagogical content coursework that is more appropriate for the elementary school (K-6) endorsement, which will further educator quality.

47. Comment: The commenter expressed support for the proposed amendments at N.J.A.C. 6A:9B-10.2 for the elementary school (K-6) endorsement. The commenter stated, as an elementary school teacher for 30 years, the commenter has seen a decline in the quality of educators. The commenter also stated that teachers should have more training on how to teach reading, writing, and mathematics. (49)

Response: The Department appreciates the support for the amendments at N.J.A.C. 6A:9B-10.2. The amendments at N.J.A.C. 6A:9A-3.3 and 6A:9B-10.2 will ensure novice teachers are prepared with content-based pedagogy necessary to integrate literacy in all content areas. N.J.A.C. 6A:9A-3.1(b) requires educator preparation programs to undergo accreditation, which provides quality assurance of educator preparation and drives continuous improvement of programs preparing educators to be successful in classrooms.

48. Comment: The commenter expressed opposition to the proposed amendments at N.J.A.C. 6A:9B-10.2 that would delete the requirement for elementary school teachers to double major to meet the requirements to teach in New Jersey schools. The commenter stated that it is imperative that educators not only understand effective pedagogy, which presumably an education major provides, but to also have deep subject knowledge and a rigorous background in a specific non-education field. The commenter also stated New Jersey has some of the best schools and teachers in the country and counts the double major as one of the reasons why. The commenter asked if the Department knows if the teacher shortage is due to seeing a precipitous decline in the numbers of new teachers being trained in New Jersey or are a huge number of teachers resigning or retiring. The commenter stated that if the latter is the reason for the teacher shortage, then the problem is with retention and not training. The commenter also stated it would make more sense to figure out ways to better support and pay teachers who are currently working in the field, rather than to change one of the things that makes New Jersey teachers great. (31)
- Response: The Department disagrees with the commenter. Existing N.J.A.C. 6A:9B-10.2 does not require a double major to earn the elementary school (K-6) endorsement. Colleges design degree programs and have the discretion to create an elementary education major that could lead to the elementary school (K-6) endorsement (for example, a bachelor of arts in elementary education), or to require individuals seeking a CEAS with an elementary school (K-6) endorsement to major in another area for degree completion and complete the necessary elementary education coursework (for example, a bachelor of arts in English plus requisite elementary education courses). The amendments at N.J.A.C. 6A:9B-10.2 will allow for a combination of content knowledge and



pedagogical content knowledge that is more appropriate for the elementary school (K-6) endorsement.

The Department regularly reviews and analyzes teacher pipeline data to determine which areas are difficult to staff. The Department does not have data to substantiate a shortage of elementary education teachers, as elementary school (K-6) endorsements are issued at a higher rate than elementary teachers are hired in New Jersey. The Department's efforts to address staffing concerns include recruitment, as well as retention. The Department does not influence teacher salaries, as salaries are determined at the school district level through collective bargaining agreements.

49. Comment: The commenter stated that lowering the requirements for earning an instructional certificate would not help bridge the gap for the State's steep decline in assessment scores. The commenter also stated that existing N.J.A.C. 6A:9B-10.2 requires a double major in elementary education and a specific subject area and that the double major is necessary to connect content knowledge with practical application. The commenter stated that the 30-credit requirement to major in a subject area and concurrently complete education courses enables candidates entering the teaching field to learn how to implement a curriculum based on their expertise in the content area, while acquiring the skills to apply multiple methodologies for the many learning styles within school populations. The commenter contended that lessening requirements for teachers will not make students smarter but will cause assessment scores to decline even more. The commenter suggested that the focus should be on a high-quality education, producing well-educated and well-trained teachers who have a command of the content, as well as the ability to impart their knowledge to facilitate critical thinkers and life-long learners. (42)

Response: The Department is committed to educational excellence for all students. The Department disagrees that the amendments at N.J.A.C. 6A:9B-10.2 will result in lower quality educators. Existing N.J.A.C. 6A:9B-10.2 does not require a double major to earn the elementary school (K-6) endorsement. Colleges design degree programs and have the discretion to create an elementary education major that could lead to the elementary school (K-6) endorsement (for example, a bachelor of arts in elementary education), or to require individuals seeking a CEAS with an elementary school (K-6) endorsement to major in another area for degree completion and complete the necessary elementary education coursework (for example, a bachelor of arts in English plus requisite elementary education courses). The amendments will allow educator preparation programs for elementary education to develop coursework that prioritizes the most appropriate deep content knowledge based on the level of instruction educators will be expected to provide. The amendments also will allow for a combination of content knowledge and pedagogical content knowledge that is more appropriate for the elementary school (K-6) endorsement.

50. Comment: The commenter expressed concern regarding the Department's proposals at N.J.A.C. 6A:9B-10.2 and 11.2 requiring teacher candidates to complete six to nine credits in pedagogical content knowledge for teaching early childhood and elementary mathematics; nine to 12 credits in pedagogical content knowledge for teaching elementary reading and literacy; and 12 to 15 credits in pedagogical content knowledge for teaching early childhood reading and literacy. The commenter recommended removing the credit or equivalent requirement and maintaining the pedagogical topics that should be covered in elementary and early childhood educator preparation programs. The commenter stated that prescriptive credit requirements will require educator preparation programs to exceed the 120-credit

limit for bachelor's degrees and 30-credit limit for master's degrees. The commenter further stated that educator preparation programs would need to adjust programs and would risk removing foundational courses and clinical course credits, which could have unintended consequences that would weaken the preparation of teachers. (84)

Response: The Department declines to adopt the commenter's recommendations to delete credit ranges for the elementary school (K-6) and preschool through grade three endorsements proposed at N.J.A.C. 6A:9B-10.2 and 6A:9B-11.2, respectively. The Department disagrees that proposed content requirements will increase the credit course load for candidates. The amendments offer flexibilities to educator preparation programs to meet the content requirements through coursework and/or clinical experiences. Educator preparation programs will have the opportunity to repurpose existing courses and clinical experiences to meet the requirements. Additionally, the amendments at N.J.A.C. 6A:9B-10.2 and 11.2 will reduce the number of liberal arts credits to 30 from 60 to cover core subject areas for preschool through grade three and elementary school (K-6) endorsement candidates. An analysis of New Jersey undergraduate degree programs suggests that most candidates would meet these content credits through the core content programming at an institution well before entering an educator preparation program. The Department is committed to ensuring that all preschool through grade three and elementary school teachers are well-prepared to support young learners in developing their literacy and mathematics skills. Research suggests there is a need to attend to the preparation of elementary teachers in developing their pedagogical skills in literacy and mathematics content areas.

The Department is committed to educational excellence for all students. The Department disagrees that the amendments at N.J.A.C. 6A:9B-10.2 will result in lower

quality preparation and clinical experiences. The Department contends that the amendments will allow educator preparation programs to prioritize the most appropriate deep content knowledge based on the level of instruction educators will be expected to provide.

51. Comment: The commenters stated that the proposed amendments at N.J.A.C. 6A:9B-10.2 and 11.2, which adjust requirements for elementary school (K-6) and preschool through grade three endorsements will result in changes to educator preparation programs. The commenters suggested that the Department remove the specific credit or equivalent requirements. The commenters stated that prescribing credit requirements will require an educator preparation program to exceed limits on course credits -- 120 credits for bachelor's degree program and 30 credits for master's degree programs. The commenters also stated that longer programs will discourage candidates from pursuing education as a profession. The commenters further stated that educator preparation programs will be forced to remove other courses and clinical components, which could weaken the preparation of candidates. (47 and 48)

Response: The Department declines to adopt the recommendations to delete credit ranges for elementary school (K-6) and preschool through grade three endorsements proposed at N.J.A.C. 6A:9B-10.2 and 6A:9B-11.2, respectfully. The Department disagrees that proposed content requirements will increase the credit course load for candidates. The amendments offer flexibilities to educator preparation programs to meet the content requirements through coursework and/or clinical experiences. Educator preparation programs will have the opportunity to repurpose existing courses and clinical experiences within programs to meet the requirements. Additionally, the amendments at N.J.A.C. 6A:9B-10.2 and 11.2 reduce the number of liberal arts credits to 30 from 60 to cover core

subject areas for preschool through grade three and elementary school (K-6) endorsement candidates. An analysis of New Jersey undergraduate degree programs suggests that most candidates would meet these content credits through the core content programming at an institution well before entering an educator preparation program. The Department is committed to ensuring that all preschool through grade three and elementary school teachers are well-prepared to support our earliest learners in developing their literacy and mathematics skills. Research suggests there is a need to attend to the preparation of elementary teachers in developing their pedagogical skills in their literacy and mathematics content areas.

52. Comment: The commenter expressed concern regarding the required Elementary Education: Multiple Subjects Praxis test for the elementary school (K-6) endorsement because elementary school teachers do not teach half of the test items on the Elementary Education: Multiple Subjects Praxis test. The commenter stated that the Elementary Education: Multiple Subjects Praxis test is tailored more to high school teachers rather than elementary school teachers. (60)

Response: The Department disagrees with the commenter that the Elementary Education: Multiple Subjects Praxis test does not address the content that is required to teach kindergarten through grade six. The current authorization for the elementary school (K-6) endorsement at N.J.A.C. 6A:9B-10.2 allows the educator to teach full time a variety of subjects, such as language arts literacy, mathematics, science, computer and information literacy, world languages, and social studies. The Elementary Education: Multiple Subjects Praxis test's content is aligned to the specific subject areas and grade levels.

New Jersey elementary school teachers participated in a standard setting study for the Elementary Education: Multiple Subjects Praxis test before it was adopted.

53. Comment: The commenter requested clarification regarding what GPA requirements for candidates, if any, would be required at proposed new N.J.A.C. 6A:9B-10.4(b) for the science add-on endorsement. (1)

Response: Since proposed new N.J.A.C. 6A:9B-10.4(b) is a science add-on endorsement to an existing endorsement, the GPA requirement would already have been met by qualifying for the existing endorsement. There is no additional GPA requirement for the science add-on endorsement.

54. Comment: The commenters suggested that the Department amend N.J.A.C. 6A:9B-10.6 to permit existing certificate holders to earn the technology education endorsement by completing 15 credits in three core principles of technology and engineering education with additional choice electives to help educate teachers to meet a school district's specific program needs. The commenters also stated that they are actively working with the New Jersey Technology and Engineering Educators Association and speaking with several colleges and universities in New Jersey to promote technology and engineering education. (43, 44, and 45)

Response: The Department declines the commenters' suggestion to create a 15-credit add-on option for the technology education endorsement. The 15-credit add-on science endorsement proposed at N.J.A.C. 6A:9B-10.4(b) is for educators who already hold instructional certificates with science endorsements. There is no aligned technology education endorsement that could allow for a comparable add-on endorsement option for certified teachers. The Department declines the commenters' suggestion to adjust the

content requirements for technology education. The existing content requirements for technology, engineering, and design subjects at N.J.A.C. 6A:9B-10.6 were developed in collaboration with experts in the field of technology education.

55. 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 preparing 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. (46, 50, 51, 52, 53, 63, 64, 65, and 72 through 80)

Response: The Department declines 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 only 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 at N.J.A.C. 6A:9B-10.4(b) is for educators who already hold instructional certificates with science endorsement. There is no aligned technology education endorsement that could allow for a comparable add-on endorsement option for instructional certificate holders.

56. Comment: The commenters proposed changes to the technology education endorsement at N.J.A.C. 6A:9B-10.6 to be in alignment with the NJSL Standard 8.2 and the national standards. The commenters emphasized the importance of technology and engineering education because technology and engineering offer students opportunities to authentically utilize science and mathematics. (43, 44, and 45)

Response: The Department declines the commenter's suggestion. In 2020, the NJSL were updated to incorporate the concepts and skills previously included in NJSL Standard 8.1 Educational Technology across multiple disciplinary concepts, such as career readiness, life literacies, and key skills (NJSL Standard 9.4). Given this alignment, the Department expects students to demonstrate increasing levels of proficiency to access, manage, evaluate, and synthesize information in their personal, academic, and professional lives. Therefore, school districts can adopt or develop technology curricula and incorporate concepts across content areas that address the NJSL.

57. Comment: The commenter recommended that the name for the technology education endorsement be changed to "technology and engineering education" at N.J.A.C. 6A:9B-10.6.



The commenter suggested that a 15-credit add-on endorsement that focuses on three core principles of technology and engineering education be added as a pathway for certified teachers, similar to the requirements at N.J.A.C. 6A:9B-10.4(b) and 11.13. The commenter stated that additional choice electives, such as design thinking, prototyping, societal impacts, and safe use of tools and machines, can help train a teacher to meet a school district's specific needs. (32)

Response: The Department declines to propose the commenter's suggested changes.

Endorsement areas for instructional certificates align with the NJSLS, which acknowledge the integration of technology throughout the standards. In 2020, the NJSLS were updated to incorporate the concepts and skills previously included in Standard 8.1 Educational Technology by integrating technology across multiple disciplinary concepts, such as career readiness, life literacies, and key skills at Standard 9.4. Given this alignment, the Department expects students to demonstrate increasing levels of proficiency to access, manage, evaluate, and synthesize information in their personal, academic, and professional lives. Therefore, school districts can adopt or develop technology curricula and incorporate concepts across content areas that address the NJSLS. Adding engineering to the technology education endorsement would be misaligned with the intent of the current NJSLS.

The Department also declines the commenter's suggestion to offer a 15-credit pathway to adding the technology education endorsement. The proposed computer science endorsement at N.J.A.C. 6A:9B-10.15 offers multiple pathways for attaining the endorsement, which includes completing 15 credits. The level of overlap between technology education and computer science, as well as the adjusted NJSLS structure integrating computer science and technology, make the commenter's request unnecessary.

58. Comment: The commenter requested clarification on potential impacts of eliminating endorsements and course offerings. The commenter asked whether individuals currently holding the speech arts and dramatics endorsements will continue to be qualified to teach course offerings that are part of New Jersey’s graduation requirements since the endorsement is proposed for deletion. (2)

Response: The Department did not propose, at N.J.A.C. 6A:9B-10.8, to eliminate the speech arts and dramatics endorsements or course offerings. The Department proposed to delete “and dramatics” because there is a separate theater endorsement that is equivalent to dramatics. Therefore, “and dramatics” is no longer needed and was deleted throughout this chapter, where necessary. The Department has separated the speech arts component from dramatics, which will be available as a separate endorsement.

59. Comment: The commenters expressed concern about the requirements at proposed new N.J.A.C. 6A:9B-10.15 for elementary school teachers who will be teaching computer science after July 1, 2027. The commenters requested that the Department reconsider the computer science endorsement requirement for elementary school teachers because it will limit the number of computer science teachers in New Jersey. The commenters stated that school districts have done a good job at recruiting teachers from other subject areas, primarily high school mathematics, to teach computer science to offer equitable opportunities for students. The commenters also stated that teachers will not want to teach computer science anymore if the Department requires teachers to obtain the new endorsement. (34, 27, 28, 29, and 39)

Response: Elementary school teachers who hold an elementary school (K-6) endorsement will be able to continue to teach basic computer skills and information literacy pursuant

to the existing authorizations at N.J.A.C. 6A:9B-9.3(b)2ii. Holders of the elementary school endorsement are authorized to teach English language arts, mathematics, science, computer and information literacy, and social studies to students in kindergarten through grade six. New N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach computer science, as defined in NJSLS Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement. However, teachers holding elementary school (K-6) endorsements can continue to teach computer and information literacy full-time and all remaining subjects, including computer science, no more than one half of the daily instructional assignment, pursuant to N.J.A.C. 6A:9B-9.3(b)2ii and iv.

60. Comment: The commenters contended that an extra endorsement is not necessary for educators to teach computer science in kindergarten through grade six, as proposed at N.J.A.C. 6A:9B-10.15. The commenters further stated that only appropriate professional development and access to materials and programs are needed to teach computer science at these grade levels. (5 and 6)

Response: Elementary school teachers who hold an elementary school (K-6) endorsement will be able to continue to teach basic computer skills and information literacy pursuant to the existing authorizations at N.J.A.C. 6A:9B-9.3(b)2ii. Holders of the elementary school endorsement are authorized to teach English language arts, mathematics, science, computer and information literacy, and social studies to students in kindergarten through grade six. New N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach

computer science, as defined in NJSL Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement. However, teachers holding elementary school (K-6) endorsements can continue to teach computer and information literacy full-time and all remaining subjects, including computer science, no more than one half of the daily instructional assignment, pursuant to N.J.A.C. 6A:9B-9.3(b)2ii and iv.

61. Comment: The commenters expressed concern that proposed new N.J.A.C. 6A:9B-10.15 would require elementary school teachers to pass the State test of computer science knowledge and to obtain the computer science endorsement. The commenters stated that the test is written for teachers of Advanced Placement computer science and requested the authorization of an alternative test for educators who teach in kindergarten through grade eight school districts. The commenters expressed a commitment to computer science education for all students in New Jersey and stated that requiring the Computer Science Praxis test and an endorsement will have the opposite effect and will result in far fewer teachers willing to teach the NJSL in computer science and design thinking. The commenters contended that the Computer Science Praxis test is an inappropriate assessment for the elementary knowledge base needed to implement many of the standards in kindergarten through grade eight. (7 and 81)

Response: Elementary school teachers who hold an elementary school (K-6) endorsement will be able to continue to teach basic computer skills and information literacy pursuant to the existing authorizations at N.J.A.C. 6A:9B-9.3(b)2ii. Holders of the elementary

school endorsement are authorized to teach English language arts, mathematics, science, computer and information literacy, and social studies to students in kindergarten through grade six. New N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach computer science, as defined in NJSL Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement. However, teachers holding elementary school (K-6) endorsements can continue to teach computer and information literacy full-time and all remaining subjects, including computer science, no more than one half of the daily instructional assignment, pursuant to N.J.A.C. 6A:9B-9.3(b)2ii and iv.

62. Comment: The commenters strongly supported the proposed regulations that would require all kindergarten through grade eight students to receive computer science education. The commenters also disagreed with the requirement at new N.J.A.C. 6A:9B-10.15 for all computer science teachers, including in kindergarten through grade six, to hold a computer science endorsement. The commenters stated that the endorsement will place an undue burden on school districts and teachers, thereby making it more difficult to implement quality and equitable computer science education for students. The commenters also stated that no other state requires a computer science endorsement for lower grade levels and New Jersey should not be the first. The commenters stated that adding “computer science” at N.J.A.C. 6A:9B-9.3(a)2ii would allow anyone with an elementary school endorsement to teach computer science and would be a better solution. (8, 9, and 10)

Response: Elementary school teachers who hold an elementary school (K-6) endorsement

will be able to continue to teach basic computer skills and information literacy under the existing authorizations at N.J.A.C. 6A:9B-9.3(b)2ii. Holders of the elementary school endorsement are authorized to teach English language arts, mathematics, science, computer and information literacy, and social studies to students in kindergarten through grade six. New N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach computer science, as defined in NJSL Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement. However, teachers holding elementary school (K-6) endorsements can continue to teach computer and information literacy full-time and all remaining subjects, including computer science, no more than one half of the daily instructional assignment, pursuant to N.J.A.C. 6A:9B-9.3(b)2ii and iv.

63. Comment: The commenter contended that proposed new N.J.A.C. 6A:9B-10.15 will require a computer science endorsement for all kindergarten through grade six teachers and will negatively impact the implementation of the NJSL for computer science. The commenter stated that New Jersey will be unable to meet the goal of providing all students with equitable computer science education. The commenter also contended that the proposed regulations will limit the number of STEM and computer science teachers in kindergarten through grade six, particularly in hard-to-staff subject areas and geographical locations. (11)

Response: Elementary school teachers who hold an elementary school (K-6) endorsement will be able to continue to teach basic computer skills and information literacy pursuant

to the existing authorizations at N.J.A.C. 6A:9B-9.3(b)2ii. Holders of the elementary school endorsement are authorized to teach English language arts, mathematics, science, computer and information literacy, and social studies to students in kindergarten through grade six. New N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach computer science, as defined in NJSLS Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement. However, teachers holding elementary school (K-6) endorsements can continue to teach computer and information literacy full-time and all remaining subjects, including computer science, no more than one half of the daily instructional assignment, pursuant to N.J.A.C. 6A:9B-9.3(b)2ii and iv.

64. Comment: The commenter stated that the Department should amend N.J.A.C. 6A:9B-9.3(b)2ii to add “computer science” to the list of subjects that elementary school endorsement holders are allowed to teach. The commenter stated that preschool through grade three or elementary school endorsement educator preparation programs do not require candidates to take a kindergarten through grade 12 Computer Science Praxis test. The commenter contended that elementary school teachers can utilize strong professional development, as well as training during their educator preparation programs, to develop the skills necessary to support preschool through grade six students' computer literacy skills rather than the requirements proposed at N.J.A.C. 6A:9B-10.15. (12)
- Response: Elementary school teachers who hold an elementary school (K-6) endorsement will be able to continue to teach basic computer skills and information literacy pursuant

to the existing authorizations at N.J.A.C. 6A:9B-9.3(b)2ii. Holders of the elementary school endorsement are authorized to teach English language arts, mathematics, science, computer and information literacy, and social studies to students in kindergarten through grade six. New N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach computer science, as defined in NJSL Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement. However, teachers holding elementary school (K-6) endorsements can continue to teach computer and information literacy full-time and all remaining subjects, including computer science, no more than one half of the daily instructional assignment, pursuant to N.J.A.C. 6A:9B-9.3(b)2ii and iv.

65. Comment: The commenter contended that teachers should not need a computer science endorsement to teach computer science in kindergarten through grade five as proposed at N.J.A.C. 6A:9B-10.15. The commenter stated that there is a shortage of computer science teachers and school districts cannot afford to pay teachers with computer science endorsements to teach in kindergarten through grade five. The commenter suggested that schools offer professional development for elementary school teachers to infuse some basic coding concepts into the lessons elementary teachers already conduct. The commenter also stated that the computer science endorsement should be available in 10 to 15 years in the future. (13)

Response: Elementary school teachers who hold an elementary school (K-6) endorsement will be able to continue to teach basic computer skills and information literacy pursuant



to the existing authorizations at N.J.A.C. 6A:9B-9.3(b)2ii. Holders of the elementary school endorsement are authorized to teach English language arts, mathematics, science, computer and information literacy, and social studies to students in kindergarten through grade six. New N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach computer science, as defined in NJSL Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement. However, teachers holding elementary school (K-6) endorsements can continue to teach computer and information literacy full-time and all remaining subjects, including computer science, no more than one half of the daily instructional assignment, pursuant to N.J.A.C. 6A:9B-9.3(b)2ii and iv.

P.L. 2018, c. 81 requires the Department to establish a computer science endorsement. N.J.A.C. 6A:9B-10.15 will implement the law and provide individuals interested in earning the endorsement until July 1, 2027, to meet the requirements. This extended implementation timeline addresses the time necessary for school districts to support educators who want to seek the computer science endorsement.

66. Comment: The commenter disagreed with the Department's proposal at N.J.A.C. 6A:9B-10.15 and stated that the content taught at the elementary level does not have anything to do with the Computer Science Praxis test for the high school computer science teachers. The commenter stated that if an elementary school teacher has passed the new Computer Science Praxis test, it would be unreasonable to require the teacher to complete the additional content knowledge of 15 credits of computer science to teach computer science. The commenter

contended that any educated teacher will have the content knowledge needed to introduce the basic computer science skills and knowledge that are part of the computer science elements of the NJSLS. (14)

Response: Elementary school teachers who hold an elementary school (K-6) endorsement will be able to continue to teach basic computer skills and information literacy pursuant to the existing authorizations at N.J.A.C. 6A:9B-9.3(b)2ii. Holders of the elementary school endorsement are authorized to teach English language arts, mathematics, science, computer and information literacy, and social studies to students in kindergarten through grade six. New N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach computer science, as defined in NJSLS Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement. However, teachers holding elementary school (K-6) endorsements can continue to teach computer and information literacy full-time and all remaining subjects, including computer science, no more than one half of the daily instructional assignment, pursuant to N.J.A.C. 6A:9B-9.3(b)2ii and iv.

New N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach computer science, as defined in NJSLS Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement.

67. Comment: The commenters expressed concern regarding the computer science endorsement requirements for kindergarten through grade six teachers at proposed new N.J.A.C. 6A:9B-10.15. The commenters stated that the proposal establishes the same requirements for all computer science teachers in kindergarten through grade 12, including 15 credits and taking the State test of computer science content knowledge. The commenters also stated that no other state has such rigorous requirements for kindergarten through grade six teachers and that the computer science requirement for kindergarten through grade six teachers should be different than high school teachers. The commenters contended that proposed new N.J.A.C. 6A:9B-10.15 will cause New Jersey to lose computer science teachers and students will fall behind in computer science. (15, 16, 17, 18, and 19)

Response: Elementary school teachers who hold an elementary school (K-6) endorsement will be able to continue to teach basic computer skills and information literacy pursuant to the existing authorizations at N.J.A.C. 6A:9B-9.3(b)2ii. Holders of the elementary school endorsement are authorized to teach English language arts, mathematics, science, computer and information literacy, and social studies to students in kindergarten through grade six. New N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach computer science, as defined in NJSL Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement. However, teachers holding elementary school (K-6) endorsements can continue to teach computer and information literacy full-time and all remaining

subjects, including computer science, no more than one half of the daily instructional assignment, pursuant to N.J.A.C. 6A:9B-9.3(b)2ii and iv.

New N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach computer science, as defined in NJSL Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement. However, teachers holding elementary school (K-6) endorsements can continue to teach computer and information literacy full-time and all remaining subjects, including computer science, no more than one half of the daily instructional assignment, pursuant to N.J.A.C. 6A:9B-9.3(b)2ii and iv.

68. Comment: The commenter expressed concern regarding the computer science endorsement requirements for kindergarten through grade six teachers at proposed new N.J.A.C. 6A:9B-10.15. The commenter stated that the commenter has been teaching first and second grade computers and STEM for many years and has used many different robots, micro bits, and coding programs with students. The commenter also stated that the commenter teaches all of the first and second grade students in the school district and, if the commenter is not qualified to teach the NJSL for computer science, it would greatly diminish the level of the school's computer science program. (20)

Response: Elementary school teachers who hold an elementary school (K-6) endorsement will be able to continue to teach basic computer skills and information literacy pursuant to the existing authorizations at N.J.A.C. 6A:9B-9.3(b)2ii. Holders of the elementary school endorsement are authorized to teach English language arts, mathematics, science,

computer and information literacy, and social studies to students in kindergarten through grade six. New N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach computer science, as defined in NJSL Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement. However, teachers holding elementary school (K-6) endorsements can continue to teach computer and information literacy full-time and all remaining subjects, including computer science, no more than one half of the daily instructional assignment, pursuant to N.J.A.C. 6A:9B-9.3(b)2ii and iv.

New N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach computer science, as defined in NJSL Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement. However, teachers holding elementary school (K-6) endorsements can continue to teach computer and information literacy full-time and all remaining subjects, including computer science, no more than one half of the daily instructional assignment, pursuant to N.J.A.C. 6A:9B-9.3(b)2ii and iv.

69. Comment: The commenters expressed concern about proposed new N.J.A.C. 6A:9B-10.15, which will require elementary school teachers to obtain the computer science endorsement and pass the State test of computer science knowledge (Computer Science Praxis test). The commenters stated that requiring elementary school teachers to obtain the computer science

endorsement will become a significant restricting factor in staffing and, therefore, make it more difficult to implement quality and equitable computer science education for all students in the State. The commenters also stated that many educators who already teach computer science in the lower grades would reconsider whether they want to continue specializing in computer science instruction if forced to take the Computer Science Praxis test and earn additional credits. The commenters further stated that no other state requires educators to pass the Computer Science Praxis test to teach computer science in elementary schools and most states do not require additional endorsements. The commenters suggested that the Department add “computer science” to the list of subjects at N.J.A.C. 6A:9B-9.3(b)2ii that elementary school (K-6) endorsement holders are allowed to teach. The commenters stated that the suggested change would allow all elementary school teachers to teach computer science without requiring an additional endorsement. The commenters also stated that the suggested change still would provide the opportunity for candidates to obtain the proposed computer science endorsement if they find it valuable. (21 and 24)

Response: The Department disagrees with the commenters. The new computer science endorsement will authorize holders to teach computer science as described in NJSL Standard 8.1 in all New Jersey public schools. The Department disagrees that adding computer science to the list of classes that can be taught by holders of the elementary school (K-6) endorsement is necessary. Elementary school teachers who hold an elementary school (K-6) endorsement will be able to continue to teach basic computer skills and information literacy pursuant to the existing authorizations at N.J.A.C. 6A:9B-9.3(b)2ii. Holders of the elementary school endorsement are authorized to teach English language arts, mathematics, science, computer and information literacy, and social studies to students in kindergarten through grade six. New

N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach computer science, as defined in NJSL Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement. However, teachers holding elementary school (K-6) endorsements can continue to teach computer and information literacy full-time and all remaining subjects, including computer science, no more than one half of the daily instructional assignment, pursuant to N.J.A.C. 6A:9B-9.3(b)2ii and iv.

The new computer science endorsement at N.J.A.C. 6A:9B-10.15 aligns with N.J.S.A. 18A:26-2.26, which authorizes the creation of a computer science education endorsement to the instructional certificate. Computer science is a specialized endorsement, not to be combined with another endorsement. Individuals interested in teaching designated computer science courses aligned to the NJSL Standard must have a computer science endorsement after July 1, 2027, pursuant to proposed N.J.A.C. 6A:9B-10.15, thereby ensuring that candidates have completed all required coursework and passed the State test of computer science. Certificate holders already teaching computer science will have to complete minimal requirements to obtain the endorsement. Pursuant to new N.J.A.C. 6A:9B-10.15(c), candidates for the computer science endorsement who hold a standard certificate and currently teach computer science as of September 1, 2024, will be eligible for the new endorsement if they receive two effective or highly effective ratings in teaching computer science in the last four years and pass the appropriate State test of computer science content knowledge.

70. Comment: The commenters stated that requiring 15 college credits in computer science and passing the Computer Science Praxis test in the subject area is excessive for the level

of curriculum being taught in elementary school. The commenters also stated that proposed new N.J.A.C. 6A:9B-10.15 will make it much harder to staff positions. The commenters contended that teachers will no longer want to teach computer science and New Jersey will see an exodus of elementary teachers from this subject area. The commenters stated that teacher shortages in the general education field already exist and contended that instituting the proposed new requirements would reduce the candidate pool even further and result in vacancies. The commenters further contended that the proposal will be detrimental to the students not being taught computer science and could also affect peeking students' interests in computer science or engineering careers in the future. (22, 23, and 81)

Response: The Department requires content experts to demonstrate content knowledge in the subject area to earn an endorsement to teach a specific subject area. New N.J.A.C. 6A:9B-10.15 is consistent with other content-area endorsement requirements, which include content coursework and passing a content knowledge assessment. Computer science is a specialized endorsement, not to be combined with another endorsement. Individuals interested in teaching designated computer science courses aligned to the NJSLS must have a computer science endorsement after July 1, 2027, pursuant to N.J.A.C. 6A:9B-10.15, thereby ensuring that candidates have completed all required coursework and passed the State test of computer science. Certificate holders already teaching computer science will have to complete minimal requirements to obtain the endorsement. Pursuant to new N.J.A.C. 6A:9B-10.15(c), candidates for the computer science endorsement who hold a standard certificate and currently teach computer science as of September 1, 2024, will be eligible for the new endorsement if they receive



two effective or highly effective ratings in teaching computer science in the last four years and pass the appropriate State test of computer science content knowledge.

71. Comment: The commenters stated that the proposed computer science endorsement at N.J.A.C. 6A:9B-10.15 undermines the current teacher shortage, specifically in mathematics, business education, and technology and engineering education. The commenters also stated that the Department should reevaluate the endorsements required to teach computer science and instead support educators who are certified to teach mathematics, technology education, and business, which will confirm that the requirements for a stand-alone endorsement in computer science is not required. (43, 44, and 45)

Response: The Department disagrees with the commenter that the proposed computer science endorsement undermines current teacher shortages. The computer science endorsement at new N.J.A.C. 6A:9B-10.15 is a specialized area requiring specific content courses beyond the content courses required for mathematics, business education, and technology and engineering education endorsements. The new computer science endorsement at N.J.A.C. 6A:9B-10.15 aligns with N.J.S.A. 18A:26-2.26, which authorizes the creation of a computer science education endorsement to the instructional certificate. Computer science is a specialized endorsement that cannot be combined with another endorsement. Individuals interested in teaching computer science aligned to the NJSL must have a computer science endorsement, which will ensure that holders complete all required coursework and pass the State test of computer science. The content requirements for computer science endorsement were developed in collaboration with experts in the computer science field.

72. Comment: The commenter contended that, if the new computer science endorsement at N.J.A.C. 6A:9B-10.15 is adopted as proposed, school districts will struggle to find appropriately credentialed candidates for computer classes similar to the difficulties of hiring science, mathematics, and world language teachers. (57)

Response: The Department disagrees that school districts will struggle to find appropriately certified candidates to teach computer classes if new N.J.A.C. 6A:9B-10.15 is adopted. Individuals interested in teaching designated computer science courses aligned to the NJSLs must have a computer science endorsement after July 1, 2027, as proposed at N.J.A.C. 6A:9B-10.15, thereby ensuring that candidates have completed all required coursework and passed the State test of computer science. Certificate holders already teaching computer science will have to complete minimal requirements to obtain the endorsement. Pursuant to N.J.A.C. 6A:9B-10.15(c), candidates for the proposed computer science endorsement who hold a standard certificate and currently teach computer science as of September 1, 2024, will be eligible for the new endorsement if they receive two effective or highly effective ratings in teaching computer science in the last four years and pass the appropriate State test of computer science content knowledge.

73. Comment: The commenter stated that adding the requirements at N.J.A.C. 6A:9B-10.15 is not fair to the overloaded elementary school teachers. The commenter contended that the best way for elementary school teachers to obtain a computer science endorsement would be the completion of training that would allow them to teach computer science, although some school districts cannot provide adequate training. The commenter asserted that training is the best way to teach computer science, along with a requirement to become recertified in the program of choice every three years. (68)

Response: The Department disagrees with the commenter that the requirements for the new computer science endorsement at N.J.A.C. 6A:9B-10.15 will overload elementary school teachers. Elementary school teachers who hold an elementary school (K-6) endorsement will not be required to obtain the computer science endorsement to teach the subject, as they may incorporate technology in kindergarten through grade six, as necessary, pursuant to the existing authorizations at N.J.A.C. 6A:9B-9.3(b)2ii. Holders of the elementary school endorsement are authorized to teach English language arts, mathematics, science, computer and information literacy, and social studies to students in grades kindergarten through grade six. As proposed at N.J.A.C. 6A:9B-9.2(a)7, holders of other endorsements may teach computer science as defined in NSLS Standard 8.1 until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Elementary school teachers will be able to continue to teach basic computer skills and information literacy pursuant to the existing authorizations at N.J.A.C. 6A:9B-9.3(b)2ii. Also, N.J.A.C. 6A:9B-9.3(b)2iv authorizes holders of the elementary school (K-6) endorsement to teach all remaining subjects up to half of the daily instructional day.

74. Comment: The commenter expressed concern with new N.J.A.C. 6A:9B-10.15 and a teacher's ability to pass a test to become certified to teach computer science. The commenter stated that the proposed requirements would cause many teachers in elementary and middle schools and who do not teach Advanced Placement computer science to leave the profession. The commenter also stated that the Department should not be adding more work for computer science teachers because schools already struggle to retain and recruit new teachers. (70)

Response: The Department disagrees with the commenter that a teacher's ability to pass a test to earn the computer science endorsement will cause teachers to leave the profession. The Department has proposed many pathways for teachers to obtain the computer science endorsement. Individuals interested in teaching designated computer science courses aligned to the NJSLS must have a computer science endorsement after July 1, 2027, as proposed at N.J.A.C. 6A:9B-10.15, thereby ensuring that candidates have completed all required coursework and passed the State test of computer science. Certificate holders already teaching computer science will have to complete minimal requirements to obtain the endorsement. Pursuant to N.J.A.C. 6A:9B-10.15(c), candidates for the computer science endorsement who hold a standard certificate and currently teach computer science as of September 1, 2024, will be eligible for the endorsement if they receive two effective or highly effective ratings in teaching computer science in the last four years and pass the appropriate State test of computer science content knowledge.

75. Comment: The commenter expressed support for the requirement at proposed new N.J.A.C. 6A:9B-10.15 for new teachers to earn an endorsement in computer science. The commenter expressed concern regarding the impact of the new endorsement on existing teachers who may desire to switch subject areas to computer science. The commenter also stated that the proposed regulations may become a barrier to entry for computer science teachers in New Jersey. The commenter supported the mastery of the subject area through the passage of the State test of computer science content knowledge. The commenter also stated that the additional requirement of 15 postsecondary credit hours in computer science will negatively impact the important goal of having a computer science teacher in every school. (82)

Response: The Department thanks the commenter for the support for the computer science endorsement pathway for new teachers and the requirement to pass the State test of computer science content knowledge. The Department disagrees that the additional requirement of 15 content credit hours to earn the computer science endorsement will become a barrier. The Department has proposed many pathways for teachers to obtain the computer science endorsement. Individuals interested in teaching designated computer science courses aligned to the NJSLS must have a computer science endorsement after July 1, 2027, as proposed at N.J.A.C. 6A:9B-10.15, thereby ensuring that candidates have completed all required coursework and passed the State test of computer science content knowledge. Certificate holders already teaching computer science will have to complete minimal requirements to obtain the endorsement. Pursuant to N.J.A.C. 6A:9B-10.15(c), candidates for the proposed computer science endorsement who hold a standard certificate and currently teach computer science as of September 1, 2024, will be eligible for the endorsement if they receive two effective or highly effective ratings in teaching computer science in the last four years and pass the appropriate State test of computer science content knowledge.

76. Comment: The commenter strongly opposed requiring teachers to hold an endorsement to teach computer science in preschool through grade eight. The commenter stated that the new computer science endorsement will place a huge burden on small school districts when trying to hire teachers, especially if the school district splits roles among teachers due to staffing issues. (6)

Response: The Department disagrees with the commenter requiring teachers to hold an endorsement to teach computer science in prekindergarten through grade eight.

Elementary school teachers who hold an elementary school (K-6) endorsement will be able to continue to teach basic computer skills and information literacy pursuant to the existing authorizations at N.J.A.C. 6A:9B-9.3(b)2ii. Holders of the elementary school endorsement are authorized to teach English language arts, mathematics, science, computer and information literacy, and social studies to students in kindergarten through grade six. New N.J.A.C. 6A:9B-9.2(a)7 will allow holders of other endorsements to teach computer science, as defined in NJSL Standard 8.1, until July 1, 2027. After July 1, 2027, a full-time teacher of computer science in preschool through grade 12 must hold a computer science endorsement issued pursuant to N.J.A.C. 6A:9B-10.15. Therefore, individuals serving as a full-time computer science teacher must hold the computer science endorsement. However, teachers holding elementary school (K-6) endorsements can continue to teach computer and information literacy full-time and all remaining subjects, including computer science, no more than one half of the daily instructional assignment, pursuant to N.J.A.C. 6A:9B-9.3(b)2ii and iv.

77. Comment: The commenter requested that current holders of the career and technical education computer science technology endorsement be grandfathered and not required to earn the new computer science endorsement. The commenter stated that holders of the career and technical education computer science technology endorsement exceed the requirements for the new computer science endorsement at proposed new N.J.A.C. 6A:9B-10.15. (56)
- Response: New N.J.A.C. 6A:9B-10.15 aligns with N.J.S.A. 18A:26-2.26, which authorizes the creation of a computer science endorsement to the instructional certificate. Computer science is a specialized endorsement that cannot be combined with another endorsement. Individuals interested in teaching designated computer science courses aligned to the NJSL

must have a computer science endorsement after July 1, 2027, as proposed at N.J.A.C.

6A:9B-10.15, thereby ensuring that candidates have completed all required coursework and passed the State test of computer science content knowledge. Educators currently teaching computer science courses may continue using their current endorsement but must obtain the proposed computer science endorsement by July 1, 2027, through one of the proposed multiple pathways. The existing career and technical education computer science technology endorsement authorizes the holder to teach only in approved career and technical education programs in grades nine through 12 in all public schools. Since the authorizations do not align, it is not appropriate to exempt holders of this endorsement from the requirements of the new computer science endorsement.

78. Comment: The commenter stated that students should concentrate on how to type or use basic word processing commands before they take a required course in computer science. The commenter also stated that the new requirements of NJSL Standard 8.1, Computer Science do not include basic computer skills and instead focus more on coding. The commenter contended that children should be exposed to coding multiple times throughout their school career and that a computer science course should not focus on coding if it is required. The commenter also contended that a computer science course should be geared for different ages and grade levels and that middle school teachers should not have to become proficient in advanced coding to pass a test and continue teaching computer science. (55)

Response: The Department disagrees with the commenter. Existing N.J.A.C. 6A:9B-5.17 requires every teacher to demonstrate knowledge and understanding of computers and other educational technology resources and tools, as defined by the New Jersey

Professional Standards for Teachers, and includes basic word processing. Coding is part of the computer science endorsement at new N.J.A.C. 6A:9B-10.15 in alignment with NJSLS Standard 8.1, Computer Science and includes all grades levels. The NJSLS Standard 8.1, Computer Science ensures that students are taught age-appropriate skills at every grade level. The content requirements for the computer science endorsement were developed in collaboration with experts in the computer science field. To earn the computer science endorsement, candidates must pass the appropriate State test of computer science content knowledge to demonstrate the level of computer science proficiency necessary to teach the content to students.

79. Comment: The commenter asked how educators who have been teaching computer science and seek the new computer science endorsement will have to prove that they have been teaching computer science and have earned effective teacher evaluation ratings. (54)  
Response: As part of the application process for obtaining the new computer science endorsement, the school district where the educator has been teaching computer science will provide verification of employment to the Department. Teacher evaluation ratings are currently reported to the Department.
80. Comment: The commenter suggested that proposed new N.J.A.C. 6A:9B-10.15(a) be amended to specify which endorsement areas are acceptable to meet the requirement to hold a standard instructional certificate in another endorsement area. The commenter specifically suggested that the regulation state whether preschool through grade three, elementary school (K-6) or specific subject-area endorsement holders will be eligible to pursue the computer science endorsement. The commenter also suggested that the 15 credit hours of computer science coursework be amended to include a methods course



and a course on equitable and inclusive practices in computer science education that meets the needs of all learners. (26)

Response: The Department disagrees with the commenter's suggested changes at new N.J.A.C. 6A:9B-10.15 because an instructional certificate encompasses all endorsements that are necessary to serve as a classroom teacher, including preschool through grade three, elementary school (K-6), and the content area endorsements. Further, new N.J.A.C. 6A:9B-10.15 is aligned with N.J.S.A. 18A:26-2.26, which authorizes the creation of a computer science endorsement to the instructional certificate.

The Department agrees with the commenter that a methods course is an important requirement for the computer science endorsement. New N.J.A.C. 6A:9B-10.15(d) requires a three-credit course in methods of teaching computer science. Equitable and inclusive practices are required of all teachers and outlined in the New Jersey Professional Standards for Teachers at N.J.A.C. 6A:9-3.3.

81. Comment: The commenter requested the Department amend N.J.A.C. 6A:9B-11.4 to reinstate the "teacher of the handicapped" endorsement because many of the barriers to individuals entering the education field are archaic and have created a teaching shortage. (87)

Response: The Department declines the commenter's suggestion to amend N.J.A.C. 6A:9B-11.4 to reinstate the teacher of the handicapped endorsement. The teacher of students with disabilities endorsement is intended to replace the previous teacher of the handicapped endorsement. Under the Individuals with Disabilities Education Act (IDEA), states moved away from primarily self-contained instructional models for students with disabilities and toward more inclusive settings to provide the least restrictive environment for students with disabilities. This shift required teacher training, expertise, and certification to align with

fostering inclusive environments and practices for students with disabilities. The teacher of students with disabilities endorsement requires the holder to also hold an endorsement in another content area, thereby demonstrating both depth of content knowledge and special education expertise to support inclusivity. The Department remains committed to equitable education for all students and contends that reinstating the teacher of the handicapped endorsement would not align with IDEA or produce educators who are content experts trained to address the needs of students with disabilities.

82. Comment: The commenter supported the flexibilities provided for the teacher of students with disabilities endorsement at N.J.A.C. 6A:9B-11.4(a)6, as amended. The commenter recommended that the Department employ the maximum flexibility permitted by law to increase the supply of qualified candidates for the teacher of students with disabilities endorsement. (1)

Response: The Department thanks the commenter for the support of the amendments at N.J.A.C. 6A:9B-11.4(a)6. While the Department is committed to addressing staffing needs while maintaining educator quality, the Department contends that the proposed amendment represents a reasonable balance between the maximum flexibility and maintaining high expectations to broaden the pool of educators while also ensuring qualified educators receive the necessary training to best service a vulnerable student population.

83. Comment: The commenter suggested that English as a second language teachers who are not certified in a foreign language should be certified as sheltered instruction teachers because the teaching assignments can be broader in scope. (42)

Response: The English as a second language endorsement at N.J.A.C. 6A:9B-11.6 does not require an individual to hold a world language endorsement. In accordance with N.J.A.C. 6A:9B-9.3(a)3ii, English as a second language teachers are authorized to teach

students in preschool through grade 12. The Department declines the commenter's suggestion because the current scope is already broad. Additionally, there is no endorsement to the instructional certificate for sheltered instruction.

84. Comment: The commenter requested information regarding the middle school STEM endorsement at proposed new N.J.A.C. 6A:9B-11.9(d). The commenter asked if the proposed State subject-matter test requirement will be a Praxis exam that needs to be created or is there another assessment that would be used for general middle school STEM. (33)

Response: New N.J.A.C. 6A:9B-11.9(d) states that the holders of the middle school with subject-matter specialization endorsement in mathematics or science may be eligible for a middle school with subject-matter specialization endorsement in STEM by passing the necessary State subject-matter test in the additional content area. The educator must take and pass the current middle school Praxis content assessment in the additional mathematics or science content that they are seeking for the STEM endorsement.

85. Comment: The commenters stated that the new middle school subject-matter specialization endorsement in STEM at proposed N.J.A.C. 6A:9B-11.9(d) does not address technology or engineering to help the technology and engineering teacher shortage. The commenters proposed adding engineering and technology to the endorsement's authorization at N.J.A.C. 6A:9B-11.9. (43, 44, and 45)

Response: The Department disagrees with the commenters that the new middle school subject-matter specialization endorsement in STEM needs to address the technology and engineering because they are not required subjects in middle school. Due to the overlap and integration of STEM topics at the middle school level, school districts will determine the most appropriate STEM courses that endorsement holders will teach to meet the needs of

schools and students. The Department's rulemaking will allow more flexibility for teachers to gain the middle school STEM endorsement by passing an additional subject-matter content assessment without having to fulfill other endorsement requirements. The additional endorsement will broaden the scope of middle school courses that a holder can teach. The new endorsement will help address issues that school districts are facing in finding and hiring middle school teachers. The new endorsement will create a streamlined pathway for middle school teachers to be dually certified in STEM areas.

86. Comment: The commenter expressed support for the addition of the middle school STEM endorsement at N.J.A.C. 6A:9B-11.9(d). The commenter also requested that computer science be added at N.J.A.C. 6A:9B-11.9(d). (10)

Response: The Department appreciates the commenter's support for the addition of a middle school STEM endorsement at N.J.A.C. 6A:9B-11.9(d). The Department disagrees that N.J.A.C. 6A:9B-11.9(d) should be amended to add a computer science endorsement at the middle school level because the proposed rules for computer science endorsement at N.J.A.C. 6A:9B-10.15 align with N.J.S.A. 18A:26-2.26, which authorizes the creation of a computer science education endorsement to the instructional certificate. Computer science is a specialized endorsement that cannot be combined with another endorsement. Individuals interested in teaching designated computer science courses aligned to the NJSLS must have a computer science endorsement after July 1, 2027, as proposed at N.J.A.C. 6A:9B-10.15; thereby, ensuring that candidates have completed all required coursework and passed the State test of computer science. Certificate holders already teaching computer science will have to complete minimal requirements to obtain the endorsement. Pursuant to new N.J.A.C. 6A:9B-10.15(c), candidates for the proposed

computer science endorsement who hold a standard certificate and currently teach computer science as of September 1, 2024, will be eligible for the endorsement if they receive two effective or highly effective ratings in teaching computer science in the last four years and pass the appropriate State test of computer science content knowledge.

87. Comment: The commenter expressed support for proposed new N.J.A.C. 6A:9B-11.9(d) and (e) authorizing two new middle school endorsements in STEM and humanities. The commenter stated that the endorsements, if utilized, will help alleviate the teacher shortage by promoting additional staffing flexibilities. (34)

Response: The Department thanks the commenter for the support.

88. Comment: The commenter requested an amendment at N.J.A.C. 6A:9B-11.10(a)2, as amended. The commenter requested an amendment to allow the required valid Cardiopulmonary Resuscitation for Professional Rescuer (CPR) Certificate to also be issued by the Health and Safety Institute (HSI) or other entity determined by the Department to comply with the American Heart Association®, Inc. (AHA) guidelines. The commenter stated that the AHA, the American National Red Cross (ARC), and HSI are the largest CPR training providers in the United States. The commenter also stated that the HSI is nationally accredited by the Commission on Accreditation of Pre-Hospital Continuing Education (CAPCE), which is the national accreditation body for emergency medical services continuing education courses and course providers.

The commenter further stated that the New Jersey Department of Health (NJDOH) accepts valid CPR credentials from entities that are determined to comply with AHA CPR guidelines. The commenter stated that HSI is the successor to the American Safety and Health Institute (ASHI) and EMS Safety, which were entities that were

determined by the NJDOH to comply with AHA guidelines. The commenter contended that the training for HSI, AHA, and ARC are similar. The commenter suggested that the regulation, as amended, is unfairly biased for the proprietary CPR training services and products of AHA and the ARC and their subsidiary organizations, which, the commenter contended, all have a vested interest in CPR training. The commenter stated that this bias will have a cost impact by denying licensees the use of a substantially equivalent means of compliance and potentially lower-cost CPR training. The commenter also stated that the rule, as amended, has an adverse impact on HSI training centers and authorized instructors in New Jersey by preventing competition on equal and fair terms and will compromise HSI's reputation as an equivalent and accredited training organization. The commenter further stated that HSI training programs are currently accepted and approved by thousands of state agencies, occupational licensing boards, national associations, commissions, and councils in hundreds of occupations and professions. The commenter also stated that the HSI publishes quality assurance standards that meet or exceed regulatory authority requirements. The commenter further stated that HSI is a member of the Council on Licensure, Enforcement, and Regulation and the American National Standards Institute and the American Society for Testing and Materials International. (85)

Response: The amendments at N.J.A.C. 6A:9B-11.10 implement parts of a petition for rulemaking from the American Red Cross to adjust the names of safety certificates and other language related to qualifications for teaching swimming, diving, and water safety in New Jersey public schools (see 54 N.J.R. 720(a)). The Department declines to add the HSI as one of the agencies that can issue the CPR certification necessary to be issued the swimming and water safety endorsement. The Department does not have the expertise to

determination whether an entity's program is comparable to AHA's guidelines and programs. The Department would need additional information and documentation before considering HSI's inclusion and would have to consult with the New Jersey Department of Health, in accordance with N.J.S.A. 18A:26-2.3.

89. Comment: The commenter stated that proposed N.J.A.C. 6A:9B-11.13(a), which creates the potential for certified teachers to earn an add-on endorsement in mathematics and science to teach foundational courses, does not define "foundational courses." The commenter requested the addition of a broad definition for this term to expand the value of an add-on endorsement to teachers, students, and school districts. (2)

Response: The Department declines the commenter's request to add a definition of "foundational courses" so school districts can determine the most appropriate courses for educators holding the mathematics and science add-on endorsement to teach. Since school districts offer varied courses, adding a definition would potentially limit school districts in placing appropriately certified staff in classrooms. The Department's goal is to ensure teachers who are still mastering the content are not teaching advanced placement or honors courses until teachers have demonstrated mastery of the content.

90. Comment: The commenter expressed opposition to the provision to delete "construction and maintenance" from the list of activities authorized by a school business administrator endorsement at N.J.A.C. 6A:9B-12.3(d)2, as amended. The commenter stated that current staffing shortages require multiple staff members to have the authority to address construction and maintenance. The commenter also stated that the proposed amendment will restrict a school district's flexibility to require the duties of school business administrators, as well. The commenter further stated that it is beneficial for school

districts to allow both school business administrators and other holders of the of the Certified Educational Facilities Manager (CEFM) certification to engage in construction and maintenance activities. (1)

Response: The Department disagrees with the commenter because “construction and maintenance” are a responsibility under the CEFM certification administered by the Department’s Office of School Facilities Planning. A CEFM is responsible for the oversight of construction and maintenance. Removing the authorization for the school business administrator at N.J.A.C. 6A:9B-12.3(d)2 clarifies the roles but does not prohibit the school business administrator from offering the necessary support to address construction and maintenance activities.

91. Comment: The commenter recommended revising the responsibilities of the provisional school administrator’s mentor as proposed at N.J.A.C. 6A:9B-12.4(h). The commenter suggested preserving the district board of education’s important role as an employer by maintaining the requirement for the district board of education to offer input regarding a provisional certificate with a school administrator endorsement, just as that role is preserved for mentors of holders of a provisional certificate with a school business administrator endorsement at proposed N.J.A.C. 6A:9B-12.7(d)4. (1)

Response: The Department disagrees with the commenter’s suggestion to amend N.J.A.C. 6A:9B-12.4(h). The regulation states that the mentor’s decision does not have to be approved by the district or board of education but does not prohibit the mentor from seeking the district board of education’s input.

92. Comment: The commenter requested clarification whether proposed new N.J.A.C. 6A:9B-12.4(g)6 will require mentors to act as agents of the Board of Examiners as there is confusion



based on the proposed deletion of existing N.J.A.C. 6A:9B-12.4(j)3. The commenter also requested the Department's rationale for deleting existing N.J.A.C. 6A:9B-12.4(j)3. (1)

Response: N.J.A.C. 6A:9B-12.4, as amended, has been reorganized to differentiate mentor roles from elements of the mentoring plan. New N.J.A.C. 6A:9B-12.4(g)6 recodifies the existing language at N.J.A.C. 6A:9B-12.4(j)3 and, thereby, moves the statement that the mentor acts as an agent of the Board of Examiners from the subsection that addresses the mentoring plan to the subsection regarding the mentor's role. The proposed reorganization does not adjust the mentor's role, as the mentor will continue to serve as an agent of the Board of Examiners.

93. Comment: The commenter thanked the Department for accepting previous recommendations and requested that the Department clarify the process for the issuance of provisional certificates for school business administrators at N.J.A.C. 6A:9B-12.7 to align with the proposed amendments to the provisional certificates for teachers and principals. (88)

Response: The Department thanks the commenter for the support. The Department finds it unnecessary to amend N.J.A.C. 6A:9B-12.7 to provide details of the process for obtaining the provisional administrative certificate for the school business administrator endorsement. N.J.A.C. 6A:9B-12.7(b) outlines the requirements for a candidate to earn a provisional administrative certificate with a school business administrator endorsement, which include possession of a school business administrator CE and an offer of employment in a position requiring the school business administrator endorsement. The Department has not proposed amendments at N.J.A.C. 6A:9B-12.7(b). The provisional process for school business administrators differs from the other roles because of the

variation in responsibilities of school business administrators, as there is often one school business administrator in each district.

94. Comment: The commenter requested clarification regarding the use of “acting” rather than “interim” administrator at proposed N.J.A.C. 6A:9B-13.1. The commenter stated that school districts seem to use the words interchangeably, at times, but the requirements for each vary greatly. (2)

Response: Pursuant to N.J.S.A. 18:16-1.1, a district board of education may designate a person to act in place of an employee during the employee’s absence, disability, or disqualification. An acting administrator serves in that capacity for a limited period of time. If the proposed acting administrator does not have the required standard administrator certificate, N.J.A.C. 6A:9B-13.1, as amended, permits the district board of education to apply, in writing, to the Commissioner, through the executive county superintendent, for permission to employ the person in an acting capacity and stating why it is necessary. An “interim” administrator is a retired administrator who holds a standard administrator certificate who has been granted a retirement allowance and is subsequently employed by a district board of education in an interim capacity not to exceed two years, in accordance with N.J.S.A. 18A:66-53.2.

95. Comment: The commenter stated that many of the barriers to individuals entering the education field are archaic and have created a teaching shortage. The commenter requested the Department amend N.J.A.C. 6A:9B-14.3 and 14.4 to allow a registered nurse with nursing experience to be exempt from the bachelor of science in nursing degree requirement for the school nurse endorsement. (87)

Response: The Department declines the commenter's suggestion to amend N.J.A.C.

6A:9B-14.3 and 14.4 to exempt a registered nurse with nursing experience from the bachelor's degree requirement to obtain the school nurse endorsement. A bachelor's degree is required to ensure school nurses are equipped with the necessary general education and college-level courses necessary to serve in the school nurse role, as school nurses are authorized to perform nursing services and provide instruction. School nurse duties are unique to the school setting and do not mirror those of a clinic or medical facility. The preparation of school nurses must reflect these nuances and address the courses required at N.J.A.C. 6A:9B-14.3 and 14.4.

96. Comment: The commenter stated the Department continues to violate the mandates of the IDEA and its implementing regulations, which do not permit regular certification for speech language specialist (SLS) to be waived for a provisional certificate as set forth at N.J.A.C. 6A:9B-14.6(e). The commenter also stated that Federal regulations preempt state regulations and, therefore, continued Federal funding for special education can be contingent on states following the IDEA's mandates. The commenter further stated that the CE with the SLS endorsement allows for a tiered approach for a holder to earn the standard certificate and is considered to be compliant with IDEA. However, the commenter asserted that the provisional certificate allows for up to four additional years of practice without earning the standard certificate and, as such appears, to be a waiver of the SLS endorsement requirements. The commenter urged the Department to review the October 4, 2022, memorandum to all state directors of special education from the U.S. Department of Education's Office of Special Education Programs and, if needed, to consult the U.S. Department of Education's Office of Special Education and Rehabilitative Services for further clarification on the issue. (62)

Response: The Department disagrees with the commenter. The IDEA requires appropriate licensure or certification, as determined and issued by the licensing authority. Candidates seeking reciprocity for out-of-State licenses are issued a New Jersey certificate in accordance with N.J.A.C. 6A:9B-14.21. In accordance with 34 CFR 300.156(b)(2)(ii), the State Board of Examiners does not waive certification requirements or issue sub-par endorsements for the SLS. Therefore, N.J.A.C. 6A:9B-14 complies with the IDEA and its regulations.

Existing regulations offer multiple pathways to earn the SLS endorsement but require all candidates to meet the same requirements to earn the standard certificate.

97. Comment: The commenter requested the Department amend N.J.A.C. 6A:9B-14.10 to remove the master's degree requirement for the learning disabilities teacher consultant (LDTC) endorsement, which would eliminate a barrier to individuals entering the education field. (87)

Response: The Department declines the commenter's suggestion to amend N.J.A.C. 6A:9B-14.10 to eliminate the master's degree requirement for the LDTC endorsement because this educational services endorsement is intended for professionals with specific training and experience to lead and oversee special education programming, support, and professional development at the school and district level. The role of holders of the LDTC endorsement requires high-level knowledge and expertise in this area through graduate-level programs.

98. Comment: The commenter stated that the Department is proposing several changes to the existing reading specialist endorsement at N.J.A.C. 6A:9B-14.13, as well as the creation of an early reading specialist endorsement. The commenter supported early reading specialist endorsement, but asserted that additional changes are required at the school and school district levels to elevate the role of the reading specialist in New Jersey's public

schools. The commenter stated that N.J.A.C. 6A:9B-14.13 should better identify what the reading specialist role is within a school or school district and should also focus more on outcomes rather than credits and the number of internship hours. (71)

Response: The Department thanks the commenter for the support. The Department disagrees with the commenter's suggested changes because the reading specialist and the early literacy specialist are unique roles within a school district. The existing reading specialist endorsement for preschool through grade 12 authorizes the holder to conduct in-service training of teachers and administrators; coordinate instruction for students or groups of students having difficulty learning to read; diagnose the nature and cause of a student's difficulty in learning to read; plan developmental programs in reading for all students; recommend methods and materials to be used in the school district reading program; and contribute to the evaluation of the reading achievement of students. The amendments will provide clarity and precision regarding the reading specialist's role by identifying the contributions of the reading specialist and acknowledging the collaboration necessary between the reading specialist and other experts to fully determine and monitor student achievement.

The new early literacy specialist endorsement allows the holder to support early literacy at the school and school district levels. The early literacy specialist endorsement is part of the Department's focus on literacy development for the early learners.

Currently, several individuals with varying levels of training and expertise support the State's youngest readers. Existing training equips reading specialists to support students in kindergarten through grade 12, but the training does not necessarily require a deep understanding of the foundational support essential to serve students in preschool through

third grade. The introduction of a new educational services endorsement specific to meeting the literacy development needs of young readers aligns to the Department's goals to create opportunities for all students to be reading at or above grade level by third grade. The endorsement will increase support available to students to actualize this goal.

99. Comment: The commenters suggested adding "school" before "library media" at N.J.A.C. 6A:9B-14.14(b) and (c). (28, 36, and 37)

Response: The CE with the SLMS endorsement is an alternate pathway for candidates who have a master's degree in library media studies. Adding "school" before "library media" at N.J.A.C. 6A:9B-14.14(b) and (c) would eliminate CE candidates who may have completed an in-State or out-of-State master's degree in library media studies.

100. Comment: The commenter asked if the clinical experience for the SLMS at N.J.A.C. 6A:9B-14.14(c)3 is part of the 36-hour semester credits or if the clinical experience is an additional three semester-hour credit, which would make the SLMS endorsement a total of 39 semester-hour credits. The commenter suggested that the regulation be amended to clearly state that the clinical experience is completed within the 36 semester-hour credits. (35)

Response: N.J.A.C. 6A:9B-14.14(c)3, as amended, requires the clinical experience to be part of the 36 required semester-hour credits. Therefore, the clinical experience can be imbedded into the required coursework and not a specific standalone course if the required clinical experience is completed in a school library media center.

101. Comment: The commenters requested assurance that the clinical experience for the SLMS endorsement required at N.J.A.C. 6A:9B-14.14(c)3, as proposed for amendment, is part of the 36 semester-hour course requirement and not an additional three credits over

the 36 semester-hour credits. (28, 36, and 37)

Response: N.J.A.C. 6A:9B-14.14(c)3, as amended, will require the clinical experience to be part of the 36 semester-hour credits. Therefore, the clinical experience can be imbedded into the required coursework and not a specific standalone course if the required clinical experience is completed in a school library media center.

102. Comment: The commenter stated that proposed N.J.A.C. 6A:9B-14.14(c)3 is unclear. The commenter stated that the use of “and” between the description of the clinical experience and the 36 semester-hours credits implies that the clinical experience is in addition to the 36 semester credits. The commenter suggested that the Department clarify the regulation by replacing “and” with “incorporated within.” The commenter also stated that N.J.A.C. 6A:9B-14.14(e)3 and (i) both cross-reference N.J.A.C. 6A:9B-14.14(b)3, while N.J.A.C. 6A:9B-14.14(g) cross-references N.J.A.C. 6A:9B-14.14(b)2 and asked if the cross-references need to be adjusted. (91)

Response: The Department disagrees with the commenter that the use of “and” between the description of the clinical experience and the 36 semester-hours credits implies that the clinical experience is in addition to the 36 semester-hour credit. The clinical experience is included within the 36 semester-hours credits and is not in addition to the requirements.

The Department agrees with the commenter that the cross-references at N.J.A.C. 6A:9B-14.14(e)3, (g), and (i) are incorrect. The correct cross-reference is N.J.A.C. 6A:9B-14.14(c)3. Therefore, the Department is changing N.J.A.C. 6A:9B-14.14(e)3, (g), and (i) at adoption to correct the cross-references.

103. Comment: The commenters requested that N.J.A.C. 6A:9B-14.14(e)4i(1) be amended to identify the New Jersey Association of School Librarians as an established program to

meet the needs for mentors of SLMS candidates. (28, 37, and 38)

Response: The Department declines to designate the New Jersey Association of School Librarians as the sole provider of SLMS mentors in New Jersey. N.J.A.C. 6A:9B-14.14(e)4i(1), as amended, will allow a Commissioner-approved mentoring program to provide a SLMS mentor if no experienced SLMS is available within the school district to mentor the candidate. The New Jersey Association of School Librarians can apply to be a Commissioner-approved mentoring program.

104. Comment: The commenters requested that the Department sunset the requirements for the associate school library media specialist (ASLMS) endorsement at N.J.A.C. 6A:9B-14.15. The commenters also requested the Department allow a window of time provided for individuals enrolled in ASLMS educator preparation programs to complete the endorsement requirements. The commenters stated that the level of preparation necessary to serve in the role is aligned to the SLMS endorsement, which is supported by research and reflects current best practices for the training of professional school librarians. (28, 37, and 38)

Response: The Department agrees with the commenters and, prior to the State Board's approval of the rulemaking at proposal level, proposed amendments at N.J.A.C. 6A:9B-14.15 to sunset the ASLMS endorsement effective September 1, 2027. The timeline will allow candidates currently in ASLMS educator preparation programs to complete them and earn the endorsement.

105. Comment: The commenter requested a copy of the proposed amendments to the ASLMS endorsement and any insight into the grandfathering of current students in the related educator preparation programs. (59)

Response: The amendments at N.J.A.C. 6A:9B-14.15 can be found on the Department's [proposed rules webpage](#) and in the notice of proposal regarding N.J.A.C. 6A:9B that was



published in the New Jersey Register (see 54 N.J.R. 2292(a)). The Department agrees with the commenters and, prior to the State Board's approval of the rulemaking at proposal level, amendments at N.J.A.C. 6A:9B-14.15 to sunset the ASLMS endorsement effective September 1, 2027. The timeline will allow candidates currently in ASLMS educator preparation programs to complete them and earn the ASLMS endorsement.

106. Comment: The commenter stated that the proposed amendments at N.J.A.C. 6A:9B-14.18 indicate that the holder of the educational interpreter endorsement must have a degree and meet both the performance and written test requirements, in addition to, the requirement of either course credits or a certificate in educational interpreting. The commenter suggested that the requirements should be a degree, the performance test, a GPA of at least 3.5, and one of the following: a written test, 12 credit hours, or a certificate in educational interpreting. (90)

Response: The Department appreciates the commenter's position. The Department will thoroughly review the rules regarding the educator interpreter endorsement requirements in conjunction with the commenter's suggestion, gather additional information on the issue, and determine the appropriateness of the commenter's proposal for a future rulemaking; however, no change is appropriate at this time.

107. Comment: The commenter expressed support for the proposed amendments at N.J.A.C. 6A:9B-14.18. The commenter stated that educational interpreters play a crucial role in the academic experience of deaf and hard-of-hearing students and that having the most skilled and qualified interpreters in the classroom working with children is a vital component of the educational experience. (82)

Response: The Department thanks the commenter for the support.

108. Comment: The commenter requested the deletion at N.J.A.C. 6A:9B-14.19(b)2iii and 14.20(b)2iii, which require teachers serving as coordinators supervising career and technical education students who are participating in cooperative education experiences to hold the cooperative education coordinator (CEC) - hazardous occupations and the CEC endorsements, respectively. The candidate stated that the required two graduate-level college courses in instructional strategies for work-based education and career information/occupational guidance creates a significant barrier to acquire the CEC endorsements for CTE teachers who have not completed a bachelor's degree program. The commenter suggested that both sections be amended to add language to require the Department to collaborate with county vocational school districts, colleges, and educator preparation programs to develop an equivalent Department-approved program for instructional strategies for work-based education and career information/occupational guidance. (39)

Response: The Department remains committed to maintaining high standards for individuals serving as CECs. The requirements at N.J.A.C. 6A:9B-14.19 and 14.20 are necessary to ensure educators serving in the roles receive the appropriate training. The Department declines the commenter's suggestion to amend rules that would require the Department to develop programs, as educator preparation program development is outside of the Department's purview. The Department entrusts experts at colleges, universities, and school districts to adequately prepare teachers to serve as CECs. The Department also does not regulate the modalities through which colleges offer coursework. N.J.A.C. 6A:9B-14.19 and 14.20 allow collaboration among county vocational school districts, colleges, and educator preparation programs to develop an equivalent Department-approved program.

109. Comment: The commenter requested that the Department delete the requirement at N.J.A.C. 6A:9B-14.20(b) for candidates to hold an instructional certificate with a CTE endorsement to obtain the CEC endorsement because this excludes other certified educators from pursuing this endorsement. Alternatively, the commenter suggested that the endorsement be issued to individuals with a school counselor endorsement because school counseling preparation includes career training. (40)

Response: The Department declines to propose the commenter's suggestion because the CEC endorsement is specifically designed to service students completing apprenticeships or cooperative educational experience within a CTE program. The coordinator assigned to oversee, and support apprenticeships or cooperative educational experiences is an expert in the industry and understands the CTE learning and working environment. The requirement at N.J.A.C. 6A:9B-14.20(b)1 to hold a standard instructional certificate with a CTE endorsement confirms that the educator has successfully taught in a CTE environment and is well positioned to support students during apprenticeships and cooperative educational experiences. N.J.A.C. 6A:19-4.2(b) allows school districts to appoint other staff members, including school counselors, to oversee structured learning experiences outside of an approved CTE environment. Therefore, the Department finds it unnecessary to adjust requirements for the CEC endorsement.

110. Comment: The commenter expressed support for the Department's goal of having all students reading by grade three. The commenter expressed appreciation for the sharpened focus on literacy and on developing teaching staff members who can lead and develop literacy strategies for all grade levels, subjects, and student groups. The commenter urged the Department to use caution before adopting, at N.J.A.C. 6A:9B-14.23, the new early literacy specialist endorsement

for prekindergarten through grade three that will be required to serve in certain positions beginning in the 2026-2027 school year. The commenter stated that amendments are necessary to avoid additional staffing shortages in this critical area. The commenter recommended that all existing reading teachers who have performed the functions envisioned for this endorsement in school districts for three years be automatically eligible for the endorsement. The commenter stated that the requirement at N.J.A.C. 6A:9B-14.23(b) should be 15 credits and not 18 credits, as proposed. (2)

Response: The Department declines to adopt the commenter's suggestion to automatically issue the early literacy specialist endorsement to reading teachers currently performing the duties of an early literacy specialist because the specific training and coursework topics required to obtain the endorsement are research-based and deemed essential for individuals who will offer reading interventions for early readers. Holders of the existing reading specialist endorsement are authorized to service students in all grades. The Department also declines the commenter's suggestion to reduce the number of credits required for the early literacy specialist endorsement because the proposed 18 semester-hour credits aligns with the required topics.

111. Comment: The commenter requested that students who are gifted and talented and are able to excel in regular classes be permitted to complete high school in two years and attend community college for two years to obtain an associate degree. The commenter stated that this kind of program will keep students engaged and meeting their potential. (42)

Response: The comment is out of the scope of this rulemaking.

112. Comment: The commenter stated that, in an effort to foster, develop, and sustain relationships with other countries' education departments, the Department should bring visiting teachers to New Jersey to support world language programs. The commenter

stated that it might be helpful to reference the teacher exchange model from “The Japan Foundation.” (67)

Response: The comment is out of the scope of this rulemaking.

**Summary of Agency-initiated Changes:**

1. The Department is making a technical change at N.J.A.C. 6A:9B-8.3(f) and 8.8(b). During the editing process, “state-approved” was inadvertently capitalized as “State-approved,” which altered the meaning by indicating that the performance assessment is approved by New Jersey. As the performance assessment referenced can be approved by another state and the two regulations reference certificates issued through interstate reciprocity, the Department proposes upon adoption to revert to the existing language.
2. The Department is making a technical change at N.J.A.C. 6A:9B-11.2(a)3i. During the editing process, “addresses” was inadvertently changed to “address.” The Department proposes at adoption to revert to the existing language.
3. The Department is making technical changes at N.J.A.C. 6A:9B-11.9(e)1 to clarify that holders of the middle school certificate with subject-matter specialization endorsement in humanities are authorized to teach social and civic engagement courses. During the editing process, a comma inadvertently was added after “social.”

**Federal Standards Statement**

The rules readopted with amendments, repeals, and new rules will further align the chapter with Federal requirements under the Every Student Succeeds Act (P.L. 114-95) and ensure New Jersey’s public-school system prepares students for postsecondary education and the

21st century workplace. The rules readopted with amendments, repeals, and new rules are in compliance with Federal regulations.

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

**Full text** of the adopted amendments and new rules follows (additions to proposal indicated in boldface with asterisks **\*thus\***; deletions from proposal indicated in brackets with asterisks \*[thus]\*):

#### Subchapter 1. Scope and Purpose

##### 6A:9B-8.3 Requirements for certificates of eligibility (CE)

(a) – (e) (No change from proposal.)

(f) A candidate who meets all requirements at N.J.A.C. 6A:9B-8.2(a)1 through 5 but did not take a \*[State-approved]\* **\*state-approved\*** performance assessment because it was not required for educator preparation program completion or for completion of an out-of-State certification program, pursuant to N.J.A.C. 6A:9B-8.2(b), shall be issued a CE. The candidate shall meet all requirements for provisional and standard certification, pursuant to N.J.A.C. 6A:9B-8.4 and 8.7, respectively, but shall be exempt from:

1. – 4. (No change from proposal.)

##### 6A:9B-8.8 Requirements for interstate reciprocity for a CEAS, CE, or standard certificate

(a) (No change from proposal.)

(b) A candidate who meets all requirements at (a)1 and 2 above, but did not take a \*[State-approved]\* **\*state-approved\*** performance assessment because it was not required for educator preparation program completion or for certification in that state shall be issued a

CE. The candidate shall meet all requirements for provisional and standard certificates pursuant to N.J.A.C. 6A:9B-8.4 and 8.7, respectively, but shall be exempt from:

1. – 4. (No change from proposal.)

(c) – (j) (No change from proposal.)

## Subchapter 9. Instructional Endorsements

### 6A:9B-9.1 Endorsement requirements

(a) To fulfill the endorsement requirements necessary for an instructional certificate, pursuant to N.J.A.C. 6A:9B-8, the candidate shall:

1. Complete one or more of the following coursework requirements for the subject area in which the candidate is seeking the endorsement:

i. – ii. (No change from proposal.)

iii. Complete at least 30 credits in a coherent sequence of courses appropriate to the subject area as documented by an official transcript from an accredited college or university, of which 12 semester-hour credits must be at the advanced level of study, including junior-, senior-, or graduate-level study as documented by the official transcript of an accredited college or university;

2. – 3. (No change from proposal.)

(b) (No change from proposal.)

### 6A:9B-10.3 Health and physical education and **\*adaptive\*** physical education

(a) - (b) (No change.)

6A:9B-10.14 Office administration and office systems technology

- (a) As part of the minimum 30 credits in content area needed to meet the endorsement requirements at N.J.A.C. 6A:9B-9.1(a)1iii,\*[,]\* a candidate for the office administration and office systems technology endorsement shall complete at a two- or four-year accredited college or university at least 12 semester-hour credits in any of the following areas:
- 1.-4. (No change.)

6A:9B-11.2 Preschool through grade three

- (a) Candidates for the preschool through grade three endorsement shall complete all certification requirements at N.J.A.C. 6A:9B-8 and the endorsement requirements at N.J.A.C. 6A:9B-9, and:
1. – 2. (No change from proposal.)
3. Provisional teachers holding a CE with a preschool through grade three endorsement shall choose to complete either 350 hours of formal instruction, pursuant to N.J.A.C. 6A:9A-5.4(a)1, or 24 semester-hour credits of preschool through grade three pedagogy at a Department-approved New Jersey college or university program. Instruction through either choice shall include:
- i. Child development and learning, including studies designed to foster understanding of the dynamic continuum of development and learning in children from birth through age eight. Required topics are cognitive and linguistic factors that affect learning and development; the creation of a climate that fosters and nurtures diversity and equitable opportunities for all children, including children who are limited English proficient and children with disabilities, and that \*[address]\* **\*addresses\*** multiple intelligences



and diverse learning styles; the integration of play; and language and literacy across the curriculum;

ii. – iii. (No change from proposal.)

(b) – (e) (No change from proposal.)

#### 6A:9B-11.9 Middle school with subject matter specialization

(a) – (d) (No change from proposal.)

(e) Holders of the middle school with subject-matter specialization endorsement in English language arts or social studies may be eligible for a middle school with subject-matter specialization endorsement in humanities by passing the necessary State subject-matter test in the additional content area and shall be exempt from the requirement at (a)3 above.

1. Holders of the middle school with subject-matter specialization endorsement in humanities shall be authorized to teach English language arts, social studies and related literature, **\*and\*** social\*[,]\* and civic engagement courses in grades five through eight in all public schools.

#### 6A:9B-11.11 Teacher of Supplemental Instruction in Reading and Mathematics, Grades K-8

(a) (No change from proposal.)

(b) To be eligible for a CEAS with a Teacher of Supplemental Instruction in Reading and Mathematics, Grades K-8 endorsement, the candidate shall:

1. (No change from proposal.)
2. Complete one of the educator preparation program alternatives culminating in clinical practice appropriate to the Elementary School Teacher K-6 endorsement in accordance with \*[in]\* N.J.A.C. 6A:9B-8.2; and
3. (No change from proposal.)

(c) – (e) (No change from proposal.)

#### 6A:9B-14.14 School library media specialist

(a) – (d) (No change from proposal.)

(e) To be eligible for the standard educational services certificate with a SLMS endorsement, a candidate shall:

1. – 2. (No change from proposal.)

3. Complete graduate-level coursework in the school library media topics at *\*[(b)3]\** *\*(c)3\** above that were not included in the candidate's library media master's program.

Holders of a CEAS with the SLMS endorsement are exempt from this requirement;

4. (No change from proposal.)

(f) (No change from proposal.)

(g) Upon completion of the residency period, the supervisor shall complete a comprehensive evaluation report on the candidate's performance based on the candidate's ability to complete the job duties at (a) above and to implement the theoretical concepts at *\*[(b)2]\** *\*(c)3\** above. The supervisor shall discuss the evaluation report with the candidate and both shall sign the report. The residency supervisor shall submit the completed evaluation to the Office. The evaluation on each candidate shall include one of the following recommendations:

1. – 3. (No change from proposal.)

(h) (No change from proposal.)

(i) The holder of a standard educational services certificate with an associate school library media specialist (ASLMS) endorsement shall be eligible for the SLMS upon completion of the requirements at *\*[(b)3]\** *\*(c)3\** above.

(j) – (l) (No change from proposal.)