

Policy 5100: Approval of Educational Personnel Preparation Programs
Comment Log
August 15, 2014-September 15, 2014

Action Type
N: No Response - Negative
NA: Not Accepted + Positive
A: Accepted o Neutral

Date	Individual/Organization	Comments	Action/Type	Rationale
9-15-14	Crystal Adkins	<p>§126-114-1. General</p> <p>Comments for section 126-114-1 General ----- The need is great for teachers to be fully proated</p>	N/o	Content of comment inconsistent with intention/language of the policy and the revision
9-15-14	David Williamson	<p>§126-114-5. Definitions</p> <p>Comments for section 126-114-5 Definitions ----- The GPA should not be raised to 3.0. My GPA was 2.8 (mainly due to my first couple years of college), but I feel that I am a good teacher and that GPA doesn't reflect on my knowledge or teaching ability.</p>	N/o	Content of comment inconsistent with intention/language of the policy revision. Individual GPA is not addressed in this revision; instead, 3.0 is a cohort average.
9-15-14	Richard Druggish	<p>§126-114-6. Professional Educator Preparation Program Requirements: Teacher</p> <p>As a member of the West Virginia Institutions of Higher Education High Quality Educator</p>	N/-	Content of comment inconsistent with intention/language of the current revision (adoption

Stakeholder Committee, I am aware of the need for revisions to Policy 5100 which reflect the current transformation of teacher educator preparation and teacher education programs through the new Council for the Accreditation of Educator Preparation Standards. At the same time, I and my colleagues within Concord University's Division of Education feel the necessity to express our concerns regarding the effect these revisions will have not only on our program but also on the state of teacher education in West Virginia.

First, we have concerns regarding the admission criteria to an approved program. Under the new guidelines, beginning in fall 2016, a 3.0 GPA cohort average must be attained for admission. The 3.0 GPA cohort average is attainable, as our teacher candidates admitted each semester have had an average GPA of 3.0 or slightly higher. However, the cohort must also have a group average minimum performance on nationally normed achievement tests such as the ACT. For the past three years (2011-13), the average ACT composite score in West Virginia has been 20.6, while the national average has lingered around 21. Although the state average is near the national average, when other factors are considered, it is more disconcerting. According to the ACT report, *The Condition of College and Career Readiness 2013: Students from Low-Income Families*, only 11% (17% for WV) of

of the CAEP Standards), but plans for the concerns to be addressed are in progress since comments refer to action steps not required to be fully implemented until Fall 2016.

low-income students met college readiness benchmarks in all four subjects on the ACT. A large number of teacher candidates in Concord's program come from low-income families and/or are first generation college students. The national composite scores at the 75th and 50th percentiles are 25 and 21. It appears that the issue of attaining a minimum average performance in the top 50 percent for 2016-17 to the top 33% in 2020 is one that must be addressed within the state prior to admission into any IHE, and there is no suggestion that this is part of the overall plan. These statistics together with the research that supports the bias of standardized tests towards low-income and minority students paint a dim future for potential teacher candidates particularly in southern West Virginia. Not only will this have a possible negative impact in admission to our program, but we also foresee a negative impact on underserved and hard to staff teaching positions in southern West Virginia school systems such as McDowell County. Second, the financial burden placed on teacher education candidates, especially those low-income students in southern WV, concerns us. The cost of testing requirements for students is quickly becoming prohibitive. For example, the PRAXIS I exam that is required for licensure in WV and required for admission into our Teacher Education Program costs the student \$135 to take. If the student doesn't pass one or more sections, the tests must be retaken at a cost of \$85

per individual test or \$125 for two. The PRAXIS II includes the PLT at a cost of \$139 and the content assessments. The costs of the content assessments vary depending on the number of tests required for licensure. For example, an elementary major would have to take and pass the elementary content and the reading tests at a cost of \$289. If one section of the elementary content tests is not passed students must pay an additional \$50 to retake each of the 4 subtests (reading, math, science, social studies) on the elementary content exam. A repeat of the WV required reading test will cost them an additional \$139. If an elementary candidate takes and passes all of the required licensure exams on the first attempt it will cost the student \$563. If and when, the state adds a performance assessment to the licensure requirements it could add as much as \$300 or more to the total testing cost for a student. Often our students must sacrifice to the point of extreme hardship on their families in order to meet these testing requirements. In many cases, our teacher candidates must postpone their education in order to secure funds to take these tests.

Currently some of the largest employers in southern West Virginia are the school systems. The path to a career as an educator is for many residents of southern West Virginia their entry into the middle class. In the recent study, "The predictive validity of measures of teacher

candidate programs and performance: toward an evidence-based approach to teacher preparation” published in the *Journal of Teacher Education*, the authors concluded that “few of the indicators of progress and performance for teacher candidates were correlated with the increases in their students’ test scores after they became classroom teachers.” These indicators of progress and performance include GPA, standardized test scores and Praxis tests. Since the validity of the measures being proposed in this policy are low, we encourage WV to utilize reliable and valid instruments that can correlate teacher candidates progress and performance with increased students’ academic performance after they become classroom teachers. Our concern is that in an effort to increase the rigor of educator preparation programs and to answer demands for accountability, we are weeding out educators who may have the potential to become great before they have the chance to prove themselves. We also believe that those who would meet the revised GPA and standardized test requirements will often choose other professions because teachers in West Virginia cannot make the salaries that doctors, lawyers, engineers, and business leaders can make.

9-11-14	Melanie Smith	<p>§126-114-6. Professional Educator Preparation Program Requirements: Teacher Comments for section 126-114-6 Professional Educator Preparation Program Requirements: Teacher ----- To increase the GPA requirement to a 3.0 when most engineering colleges only require a 2.5 would be extremely harmful and discouraging to those college students wanting to become teachers. GPA does not reflect teacher effectiveness. Support, training, exposure to the classroom, having a good mentor teacher DOES.</p>	N/o	Content of comment inconsistent with intention/language of the policy revision. Individual GPA is not increased in this revision; instead, 3.0 is a cohort average.
9-14-14	J. Noel Clinton	<p>§126-114-6. Professional Educator Preparation Program Requirements: Teacher Comments for section 126-114-6 Professional Educator Preparation Program Requirements: Teacher ----- I am all for getting the best of the best in the teaching profession! However, if you neglect to address the low pay (I believe we're either 47th or 48th paid in the nation), the best of the best will not always consider education as a career. Plus, with this inconsistent pay scale (getting an occasional pay raise then we are neglected for years and end up in the lower 5 of all states in the nation) no intelligent person will get into teaching. Thus, our current teacher shortages will simply grow. How do you plan to address that?</p>	N/-	Suggested change is not consistent with the section topic. Content of comment inconsistent with intention/language of the policy revision.

		<p>Lower standards for some and not for others? If you want to improve teacher quality you need to do 2 things: first, increase teacher pay with yearly cost of living increases, and second, invest in regular, valid teacher training and in-service to keep teachers up-to-date with how to use technology effectively and research-based educational practices.</p>		
8-24-14	Glenda Jo Pennington	<p>§126-114-6. Professional Educator Preparation Program Requirements: Teacher Comments for section 126-114-6 Professional Educator Preparation Program Requirements: Teacher ----- Comment 1: On page 9 of Policy 5100 in 126CSR114-6, point 6.2a refers to Test at a Glance. The CASE (Core) tests have a Study Companion, not a TAAG. See https://www.ets.org/praxis/prepare/materials/5712.</p>	A/+	Suggested change is consistent with intention of policy revision. Policy was revised to reflect the most current terminology regarding the "Study Companion" for the CASE test.
8-24-14	Glenda Jo Pennington	<p>§126-114-12. Additional Program Requirements Comments for section 126-114-12 Additional Program Requirements ----- Comment 2: On page 22 in 126CSR114-12.1k, the language still reflects the old policy that required an EPP that changes more than six credit</p>	A/+	Suggested change is consistent with intention of policy revision. Section 12.1k of Policy was revised to reflect the same language regarding the 25% program change as included in Section 15.5.

		<p>hours in a program to submit it to the WV EPPRB for reapproval. The language on page 27 in 126CSR114-15.5 reflects the language in the recommendation by the WV EPPRB and TEAC to allow an EPP to change up to 25% of the credit hours in the Content Specialization or Pro Ed sections of the program before resubmission to the WV EPPRB would be necessary. The language in 15.5 is good and needs to show in 12.1k.</p>		
<p>9-15-14</p>	<p>Dr. Richard Druggish</p>	<p>§126-114-14. Educator Preparation Program Approval Process Our foremost concerns are in the new CAEP standards and the position taken by the WVDE not to approve programs who fail to meet four of the five standards. We strongly believe that Concord has an exemplary educator preparation program as was evidenced in our April 2014 NCATE visit. We will continue to strive to meet the new CAEP standards in the same manner. However, historically institutions in West Virginia and across the nation did not meet all NCATE Standards and were required to have focus visits and to address unmet standards in annual reports in the interim. Yet these institutions were able to maintain their programs. Standards 1 and 2 have been and will continue to be upheld. Standard 3 has potential issues as were presented earlier in this response. In addition to those, the Standard requires the EPP to “recruit and support completion of high-quality</p>	<p>NA/-</p>	<p>Content of comment inconsistent with intention/language of the current revision (adoption of the CAEP Standards), but plans for the concerns to be addressed are in progress since comments refer to action steps not required to be fully implemented until Fall 2016.</p>

candidates from a broad range of backgrounds and diverse populations to accomplish their mission,” with an admitted pool of candidates who reflect “the diversity of America’s P-12 students.” Diversity in West Virginia is minimal, and especially so in southern West Virginia. Recruitment involves many factors, two of which are personnel and finances. At a time of fiscal constraint for IHEs in West Virginia, this places a hardship on smaller institutions to support this emphasis.

Standard 4 requires that the educator preparation program provides data on the “impact of its completers on P-12 student learning and development, classroom instruction, and schools, and the satisfaction of its completers with relevance and effectiveness of their preparation.” Standard 5 also relies heavily upon the analysis of said data. Currently the WVDE does not provide IHEs with data from school districts and schools related to P-12 learning which are necessary to report to CAEP. Although Concord does survey graduates and employers, collecting this data is a challenge simply because we have no data base that shares new hires in county school districts. Ultimately the IHE is at the mercy of both the WVDE and the local school districts to supply this information. Also, IHEs who have graduate research assistants are at an advantage in the analysis of this data. The onus of meeting this demand through financial and

		<p>faculty resources is placed upon IHEs who already are faced with decreased funding.</p> <p>Once IHEs are fully accountable for the new CAEP Standards, we believe that many, if not all, institutions in West Virginia will have difficulty meeting them, especially at the first visit. We predict negative impacts on our institutions, faculties and students, and even the greater public, who will then look to the State for the cause. We also believe that we will see a teacher shortage, both within the State and nationwide, because we will no longer be able to provide the quality teachers that Concord and other IHEs have prepared over the years.</p> <p>We are aware that the West Virginia Department of Education is, in a sense, only the messenger. However, we hope that the Department will work with IHEs to help us meet the new CAEP Standards, supporting us through a sharing of resources, data and direction, and by understanding the crisis we may all face.</p>		
8-24-14	Glenda Jo Pennington	<p>§126-114-15. Educator Preparation Program Review Board (EPPRB)</p> <p>Comments for section 126-114-15 Educator Preparation Program Review Board (EPPRB)</p> <p>-----</p> <p>Same Comment 2: On page 22 in 126CSR114-</p>	N/o	Suggested change is inconsistent with the section topic (6.2a).

8-24-14	Glenda Jo Pennington	<p>12, the language still reflects the old policy that required an EPP that changes more than six credit hours in a program to submit it to the WV EPPRB for reapproval. The language on page 27 in 126CSR14-15.5 reflects the language in the recommendation by the WV EPPRB and TEAC to allow an EPP to change up to 25% of the credit hours in the Content Specialization or Pro Ed sections of the program before resubmission to the WV EPPRB would be necessary. The language in 15.5 is good and needs to show in 6.2a.</p> <p>§126-136 Appendix E. Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure</p> <p>Comments for section 126-136 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure</p> <p>-----</p> <p>Comment 3: On page 70 in Appendix E (tables that show standards and tests required for each certification program), the Chemistry table needs to state "National Science Teachers Association (NSTA)".</p>	A+		Suggested change is consistent with intention of policy revision. "National Science Teachers Association (NSTA)" was added to Appendix E.
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Linda Bragg

From: Richard Druggish <druggishr@concord.edu>
Sent: Monday, September 15, 2014 3:01 PM
To: Linda Bragg
Subject: Response to Policy 5100
Attachments: Response to Policy 5100.doc

Linda,

I am attaching Concord's response to revisions in Policy 5100. This response addresses concerns that we have with changes to the Policy which are the result of the new CAEP standards. Whereas we realize that these changes must be reflected in Policy, we are concerned about the ramifications to teacher education at Concord and at other IHEs across the State.

Thank you for your attention to these concerns.

Rick

Richard S. Druggish, Ph.D.
Director of Teacher Education
Coordinator of Clinical Experiences
Concord University
Athens, WV 24712
(304)384-5107



DIVISION OF EDUCATION

To: Linda Bragg, Coordinator
Office of Professional Preparation
West Virginia Department of Education

From: Richard S. Druggish
Director of Teacher Education

Date: September 11, 2014

RE: WV Board of Education Policy 5100

As a member of the West Virginia Institutions of Higher Education High Quality Educator Stakeholder Committee, I am aware of the need for revisions to Policy 5100 which reflect the current transformation of teacher educator preparation and teacher education programs through the new Council for the Accreditation of Educator Preparation Standards. At the same time, I and my colleagues within Concord University's Division of Education feel the necessity to express our concerns regarding the effect these revisions will have not only on our program but also on the state of teacher education in West Virginia.

First, we have concerns regarding the admission criteria to an approved program. Under the new guidelines, beginning in fall 2016, a 3.0 GPA cohort average must be attained for admission. The 3.0 GPA cohort average is attainable, as our teacher candidates admitted each semester have had an average GPA of 3.0 or slightly higher. However, the cohort must also have a group average minimum performance on nationally normed achievement tests such as the ACT. For the past three years (2011-13), the average ACT composite score in West Virginia has been 20.6, while the national average has lingered around 21. Although the state average is near the national average, when other factors are considered, it is more disconcerting. According to the ACT report, *The Condition of College and Career Readiness 2013: Students from Low-Income Families*, only 11% (17% for WV) of low-income students met college readiness benchmarks in all four subjects on the ACT. A large number of teacher candidates in Concord's program come from low-income families and/or are first generation college students. The national composite scores at the 75th and 50th percentiles are 25 and 21. It appears that the issue of attaining a minimum average performance in the top 50 percent for 2016-17 to the top 33% in 2020 is one that must be addressed within the state prior to admission into any IHE, and there is no suggestion that this is part of the overall plan. These statistics together with the research that supports the bias of standardized tests towards low-income

and minority students paint a dim future for potential teacher candidates particularly in southern West Virginia. Not only will this have a possible negative impact in admission to our program, but we also foresee a negative impact on underserved and hard to staff teaching positions in southern West Virginia school systems such as McDowell County.

Second, the financial burden placed on teacher education candidates, especially those low-income students in southern WV, concerns us. The cost of testing requirements for students is quickly becoming prohibitive. For example, the PRAXIS I exam that is required for licensure in WV and required for admission into our Teacher Education Program costs the student \$135 to take. If the student doesn't pass one or more sections, the tests must be retaken at a cost of \$85 per individual test or \$125 for two. The PRAXIS II includes the PLT at a cost of \$139 and the content assessments. The costs of the content assessments vary depending on the number of tests required for licensure. For example, an elementary major would have to take and pass the elementary content and the reading tests at a cost of \$289. If one section of the elementary content tests is not passed students must pay an additional \$50 to retake each of the 4 subtests (reading, math, science, social studies) on the elementary content exam. A repeat of the WV required reading test will cost them an additional \$139. If an elementary candidate takes and passes all of the required licensure exams on the first attempt it will cost the student \$563. If and when, the state adds a performance assessment to the licensure requirements it could add as much as \$300 or more to the total testing cost for a student. Often our students must sacrifice to the point of extreme hardship on their families in order to meet these testing requirements. In many cases, our teacher candidates must postpone their education in order to secure funds to take these tests.

Currently some of the largest employers in southern West Virginia are the school systems. The path to a career as an educator is for many residents of southern West Virginia their entry into the middle class. In the recent study, "The predictive validity of measures of teacher candidate programs and performance: toward an evidence-based approach to teacher preparation" published in the *Journal of Teacher Education*, the authors concluded that "few of the indicators of progress and performance for teacher candidates were correlated with the increases in their students' test scores after they became classroom teachers." These indicators of progress and performance include GPA, standardized test scores and Praxis tests. Since the validity of the measures being proposed in this policy are low, we encourage WV to utilize reliable and valid instruments that can correlate teacher candidates progress and performance with increased students' academic performance after they become classroom teachers. Our concern is that in an effort to increase the rigor of educator preparation programs and to answer demands for accountability, we are weeding out educators who may have the potential to become great before they have the chance to prove themselves. We also believe that those who would meet the revised GPA and standardized test requirements will often choose other professions because teachers in West Virginia cannot make the salaries that doctors, lawyers, engineers, and business leaders can make.

Our foremost concerns are in the new CAEP standards and the position taken by the WVDE not to approve programs who fail to meet four of the five standards. We strongly

believe that Concord has an exemplary educator preparation program as was evidenced in our April 2014 NCATE visit. We will continue to strive to meet the new CAEP standards in the same manner. However, historically institutions in West Virginia and across the nation did not meet all NCATE Standards and were required to have focus visits and to address unmet standards in annual reports in the interim. Yet these institutions were able to maintain their programs. Standards 1 and 2 have been and will continue to be upheld. Standard 3 has potential issues as were presented earlier in this response. In addition to those, the Standard requires the EPP to “recruit and support completion of high-quality candidates from a broad range of backgrounds and diverse populations to accomplish their mission,” with an admitted pool of candidates who reflect “the diversity of America’s P-12 students.” Diversity in West Virginia is minimal, and especially so in southern West Virginia. Recruitment involves many factors, two of which are personnel and finances. At a time of fiscal constraint for IHEs in West Virginia, this places a hardship on smaller institutions to support this emphasis.

Standard 4 requires that the educator preparation program provides data on the “impact of its completers on P-12 student learning and development, classroom instruction, and schools, and the satisfaction of its completers with relevance and effectiveness of their preparation.” Standard 5 also relies heavily upon the analysis of said data. Currently the WVDE does not provide IHEs with data from school districts and schools related to P-12 learning which are necessary to report to CAEP. Although Concord does survey graduates and employers, collecting this data is a challenge simply because we have no data base that shares new hires in county school districts. Ultimately the IHE is at the mercy of both the WVDE and the local school districts to supply this information. Also, IHEs who have graduate research assistants are at an advantage in the analysis of this data. The onus of meeting this demand through financial and faculty resources is placed upon IHEs who already are faced with decreased funding.

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We are aware that the West Virginia Department of Education is, in a sense, only the messenger. However, we hope that the Department will work with IHEs to help us meet the new CAEP Standards, supporting us through a sharing of resources, data and direction, and by understanding the crisis we may all face.

Linda Bragg

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Monday, September 15, 2014 8:58 AM
To: Linda Bragg
Subject: Comment Received for Policy 5100 (2014-09-15 08:57:50)

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Comment Received for Policy 5100

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Name: Crystal Adkins
Organization: Aft/ teacher
Title: Teacher
City/State: Rivesville, Wv
Role: Teacher
Posted: 2014-09-15 08:57:50
Posted from IP:

Comments for section 126-114-1 General

The need is great for teachers to be fully proated

Linda Bragg

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Monday, September 15, 2014 7:59 AM
To: Linda Bragg
Subject: Comment Received for Policy 5100 (2014-09-15 07:59:13)

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Comment Received for Policy 5100

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Name: David Williamson

Organization:

Title:

City/State: Madison, WV

Role:

Posted: 2014-09-15 07:59:13

Posted from IP:

Comments for section 126-114-5 Definitions

The GPA should not be raised to 3.0. My GPA was 2.8 (mainly due to my first couple years of college), but I feel that I am a good teacher and that GPA doesn't reflect on my knowledge or teaching ability.

Linda Bragg

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Sunday, September 14, 2014 12:16 PM
To: Linda Bragg
Subject: Comment Received for Policy 5100 (2014-09-14 12:16:27)

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Comment Received for Policy 5100

#####

Name: J. Noel Clinton
Organization: Teacher, Van Devender Middle
Title: Math 7 and Honors Math 8
City/State: Parkersburg, WV
Role: Teacher
Posted: 2014-09-14 12:16:27
Posted from IP:

Comments for section 126-114-6 Professional Educator Preparation Program Requirements: Teacher

I am all for getting the best of the best in the teaching profession! However, if you neglect to address the low pay (I believe we're either 47th or 48th paid in the nation), the best of the best will not always consider education as a career. Plus, with this inconsistent pay scale (getting an occasional pay raise then we are neglected for years and end up in the lower 5 of all states in the nation) no intelligent person will get into teaching. Thus, our current teacher shortages will simply grow. How do you plan to address that? Lower standards for some and not for others? If you want to improve teacher quality you need to do 2 things: first, increase teacher pay with yearly cost of living increases, and second, invest in regular, valid teacher training and in-service to keep teachers up-to-date with how to use technology effectively and research-based educational practices.

Linda Bragg

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Thursday, September 11, 2014 8:12 PM
To: Linda Bragg
Subject: Comment Received for Policy 5100 (2014-09-11 20:11:57)

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Comment Received for Policy 5100

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Name: Melanie Smith
Organization: AFT
Title:
City/State: , WV
Role: Teacher
Posted: 2014-09-11 20:11:57
Posted from IP:

Comments for section 126-114-6 Professional Educator Preparation Program Requirements: Teacher

To increase the GPA requirement to a 3.0 when most engineering colleges only require a 2.5 would be extremely harmful and discouraging to those college students wanting to become teachers. GPA does not reflect teacher effectiveness. Support, training, exposure to the classroom, having a good mentor teacher DOES.

Linda Bragg

From: Nobody <nobody@kryten.wvnet.edu>
Sent: Sunday, August 24, 2014 4:54 PM
To: Linda Bragg
Subject: Comment Received for Policy 5100 (2014-08-24 16:54:14)

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Comment Received for Policy 5100

#####

Name: Glenda Jo Pennington
Organization: Ohio Valley University
Title: Dean, College of Education
City/State: Vienna, WV
Role: Higher Education Faculty
Posted: 2014-08-24 16:54:14
Posted from IP:

Comments for section 126-114-6 Professional Educator Preparation Program Requirements: Teacher

Comment 1: On page 9 of Policy 5100 in 126CSR114-6, point 6.2a refers to Test at a Glance. The CASE (Core) tests have a Study Companion, not a TAAG. See <https://www.ets.org/praxis/prepare/materials/5712>.

Comments for section 126-114-12 Additional Program Requirements

Comment 2: On page 22 in 126CSR114-12.1k, the language still reflects the old policy that required an EPP that changes more than six credit hours in a program to submit it to the WV EPPRB for reapproval. The language on page 27 in 126CSR114-15.5 reflects the language in the recommendation by the WV EPPRB and TEAC to allow an EPP to change up to 25% of the credit hours in the Content Specialization or Pro Ed sections of the program before resubmission to the WV EPPRB would be necessary. The language in 15.5 is good and needs to show in 12.1k.

Comments for section 126-114-15 Educator Preparation Program Review Board (EPPRB)

Same Comment 2: On page 22 in 126CSR114-12, the language still reflects the old policy that required an EPP that changes more than six credit hours in a program to submit it to the WV EPPRB for reapproval. The language on page 27 in 126CSR114-15.5 reflects the language in the recommendation by the WV EPPRB and TEAC to allow an EPP to change up to 25% of the credit hours in the Content Specialization or Pro Ed sections of the program before resubmission to the WV EPPRB would be necessary. The language in 15.5 is good and needs to show in 6.2a.

Comments for section 126-136 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure

Comment 3: On page 70 in Appendix E (tables that show standards and tests required for each certification program), the Chemistry table needs to state "National Science Teachers Association (NSTA)". All other certification program descriptions are correct. Thanks you for all your work on this policy!