

**Policy 5100, Approval of Educator Preparation Programs
Comment Log**

Comment Period: September 13 - October 16, 2023

Action

A/S Comment was accepted and supports the proposed policy.

A/C Comment was accepted and resulted in changes to the proposed policy.

N Comment was not accepted.

| Date | Commenter | Comments | Action | Rationale |
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| §126-114-1. General. | | | | |
| §126-114-2. Summary. | | | | |
| §126-114-3. Purpose. | | | | |
| §126-114-4. Authority of the WVBE. | | | | |
| §126-114-5. Definitions. | | | | |
| 10-16-2023 | Stephen Schramm | <p>5.30 - 5.40 Do not move to a singular teaching position for an entire year let a lone for a semester. There are a multitude of reasons this will results in less qualified teachers. Firstly, they only gain experience with one small population teaching a very small amount of content (the degree is listed for either all of primary or all of secondary). Secondly, not every co-teacher is a great fit for a resident either personally or professionally. These co-teachers hold massive sway over the outcome of a resident passing and it should not be left to a singular person. These two reasons are not all but the most pertinent to keep the movement of the resident to other placements. Compensate residents for their work during this time, just like we do with medical residents. Residents are unable to hold any other job during this time. It is most difficult for a resident to survive financially for one semester let alone two with no income. These two semester also incur additional financial burden because they are also paying tuition and fees to the</p> | N | Practices are in place to address the concerns of multiple placements, co-teacher mismatch, and residency stipends. |

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| | | college/university. These two things together for a year now become an impossible task to have any semblance of financial health, that will lead to massive amounts of debt or a potential lack of necessities or home. The lack of compensation for residency has been a bane of all pre-service teachers and needs to be addressed. | | |
| 10-16-2023 | Kaitlyn Schramm | Though for the record I do not agree with a year-long student teaching experience, this definition MUST be changed to read "...experienced cooperating teachers..." (plural and not singular) to give flexibility to specific areas (e.g.- P-12 certification in music education) the ability to assign students to more than one content level and therefore, more than one cooperating teacher over the course of the year. | N | This is the definition and specifics on programmatic requirements are included in section 6. |
| §126-114-6. Professional Educator Preparation Program (EPP) Requirements: Teacher Clinical Partnerships. | | | | |
| 9/25/2023 | Dr. Sarah Schimmel | 6.7.b.2 The TPA as an instrument cannot be proven valid and reliable, yet the evidence can. Also, what standards will the review process be aligned? Could there be clarification in that language moving forward? 6.7.b.2.A If the above language is clarified, this section would not be necessary. | A/C | Clarification added to define what is valid and reliable in 6.7.b.2. Items in 6.7.b.2.A revised to support the language change in 6.7.b.2 (revisions and deletions). |
| 10/16/2023 | Jason Gossett | I write my comments specifically from the view as a music teacher educator. I applaud the year-long residency. However, the specifications for preK-12 year-long residency present unnecessary roadblocks to improving music education in WV, specifically the requirement of a single programmatic experience. I have 2 primary concerns. The first concern is that in assigning the student teacher to one level (Elem, MS, or HS) they will not gain critical sequential teaching experience | N | There is a minimum of one experience, but it is not limited to one experience. |

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| | | <p>at the other levels. If a candidate is to be credentialed as a K-12 educator, they must be assessed in all specializations per 6.7.b.5.B.. Using field experiences to make up for the missing residency experience deprives our students from learning about the daily ins and outs of teaching: relationships (and the classroom management that comes from these relationships), sequencing and student learning retention, and the ebb and flow of an instructional day. The difference between teaching music K5 and HS is considerable. Not only must music teachers account for differences in students' mental development, music teachers must also account for physical and emotional development. Sequential experiences are necessary for candidates to observe and experience these differences to better create learning opportunities for their students. Candidates cannot reasonably demonstrate competence, let alone proficiency at a programmatic level through often isolated field experiences. Additionally, approximately 80 to 90% of teacher candidates in music education come to the program with a desire to teach middle or high school band, choir, or orchestra. For many those programs are the reason they chose education as a career. Because they want their residency experience to be in band, choir, or orchestra, our students will overwhelmingly choose to complete their field experience in elementary music classrooms. Because they will have to make this decision so early in the program, they 'won't know what they don't know'. It is through our coursework that many music education students, almost half, discover a preference for working with</p> | | |
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| | | <p>elementary children. Finally, the difference in maturity between 1st/2nd year music education students and 3rd/4th year students is considerable. The field experiences help our students mature. However, most are at a different developmental state in their first two year than their last. This plays a large role in what they get out of field experiences. My point here being that field experience does not equate to residency experience. Also, it will be hard to prepare students for HS Residency if they have spent all of their field experience at the elementary (and vice versa). My second concern is regarding the availability of cooperating teachers. Like Art, PE, and Agricultural Education, the field of music has fewer teachers to draw from than most other content area, often only having 1 or 2 per school. From these teachers even fewer possess the qualities and dispositions necessary to foster growth in teacher candidates. After surveying our cooperating teachers (38), 1/3 stated they would decline a teacher for the full year placement. Another ¼ stated they would not take student teachers in sequential years, and a ¼ stated they would not allow field experiences while they had student teachers (even on the off days during residency 1). That leaves us with approximately 26 potential cooperating teachers for (on average) 15 student teachers and 80 music education majors needing field experience. We can make this work, but I have grave concerns about sustainability. It will require field experiences to consist of larger groups. The larger the group the more it will disrupt the learning of k12 students, particularly at the elementary level. This will also add to cooperating</p> | | |
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| | | teachers' responsibilities during a period when we are wrestling with wide-spread burnout. I ask that policy 5100 be revised so that k12 certification programs can place candidates in an additional programmatic level during R1 or R2. This will give us (music teacher educators) flexibility to ensure candidates have the necessary experiences to enter the field ready for their students. | | |
| 10/16/2023 | Briana Nannen | Due to the fact the music education degree is k-12, we have significant concerns about the one year residency program occurring in one school at one educational level. There are pedagogical approaches and experiences in music that are vastly different at each level of education and students who only experience one level will be underprepared in terms of hands-on preparation for teaching at all levels according to their teaching certification. While providing students variety in their early clinical experiences is certainly beneficial, observing does not provide the same educational experience as teaching, which is often the first experiences our students have in working with k-12 students as the primary teacher (Residency I and Residency II). Additionally, there are concerns about the number of available music teachers in our area who would be willing to commit to a student teacher for the entire year. This is also a concern as the Residency I program moves our students to 250 hours (as opposed to the previous 75) in already heavily taxed schedules. This puts an extreme burden on some of our students to drive one hour, each way, for some placements when their schedules cannot accommodate that distance; the drive time will cut | N | There is a minimum of one experience, but it is not limited to one experience. |

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| | | <p>into the block of available time students have to be out in schools making it difficult for them to complete their hours. We aim to keep our students who are still completing coursework as close to campus as possible to maximize their time in schools. We tend to move the burden of driving to our student teachers who will be in those placements for the duration of the day and can accommodate the additional drive time. We also find value in the variety of cooperating teachers who serve our pre-service teachers by showing them alternative teaching approaches. Students also benefit from the variety of school atmospheres which vary greatly from one community in our area to the next. I would respectfully request that the music education students be granted flexibility in their residency assignments so we can provide the best educational experience for our students.</p> | | |
| 10/16/2023 | Angela Munroe | <p>6.7.b.5.C.2: Field experience and clinical practice are very different. Pre-service teachers do not gain enough experience at each programmatic level through field experience alone. Especially when the field experience occurs early in the teacher preparation program, they do not have enough pedagogical knowledge or experience. Observations are effective and necessary, but not enough to prepare them to teach at that context/level. 6.8: Yearlong Residency 6.8.c.3.A: A Pre-K-Adult program of study needs to include clinical experience at more than one programmatic level. As stated above, field experience is not enough to prepare them to teach at a particular level and context. In the field of music, each context is very different, and therefore essential to</p> | N | <p>There is a minimum of one experience, but it is not limited to one experience.</p> |

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| | | <p>experience. Teaching elementary orchestra is completely different in preparation, management, instruction, and materials from teaching elementary general music. All of these are also completely different from teaching high school band, choir, or orchestra. Music educators need a diverse skill set to effectively teach varying ages and abilities. By experiencing both elementary and secondary placements, our students can develop a more comprehensive toolkit for instruction. Completing placements in both elementary and secondary environments helps students understand the progression of curriculum and skill development from the early years to high school. This knowledge enables them to align their teaching strategies for a more cohesive curriculum for students as they progress through different grade levels. Additionally, classroom management strategies vary between elementary and classroom levels. This is something that is not effectively experienced in typical field experiences. They may observe management techniques, but they do not take responsibility for them. Looking to their future as music educators, many teachers will eventually teach across different grade levels during their career. Having experience in both elementary and secondary placements ensures that our graduates are well-prepared for a range of professional opportunities and can make a more significant impact in their future. Someone who only has a high school ensemble student teaching experience (even for a full year), is much less likely to get a job in an elementary or middle school context. We want our graduates to be marketable in many</p> | | |
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| | | teaching contexts and it is expected in WV and neighboring states that our graduates have a variety of music teaching experiences. | | |
| 10-16-2023 | Kaitlyn Schramm | It is very impractical to expect that in a state that already struggles to find certified teachers that will agree to being cooperating teachers that those people will be willing to take on student teachers for twice the amount of time as before. This will also limit the total number of available placements for student teachers. Most concerning, however, is the ambiguity of the verbiage that these pre-service teachers should have a minimum of one academic level. With certifications like P-12 music education, it is insufficient to only student teach in one level. | N | Comment not based on evidence. |
| §126-114-7. Alternative Preparation Program Requirements. | | | | |
| §126-114-8. Clinical Teacher of Record. | | | | |
| 10/09/2023 | Jeffrey Evans | I believe the hiring process for the CTR should be elaborated on more, including how long the position should be posted before the CTR is placed in the position in order to decide whether a fully certified teacher was properly sought out. It would be extremely easy for a county to chose a CTR immediately in order to receive the extra money from the salary/state aid funding. | N | These details are included in W. Va. 126CSR136, Policy 5202, Minimum Requirements for the Licensure of Professional/ Paraprofessional Personnel and Advanced Salary Classifications. |
| §126-114-9. Professional Educator Preparation Program (EPP) Requirements: Student Support and Administration. | | | | |
| §126-114-10. Additional Program Requirements. | | | | |
| §126-114-11. Authorizations and Accreditation Requirements. | | | | |
| §126-114-12. Education Preparation Program (EPP) Approval. | | | | |
| §126-114-13. Educator Preparation Program Review Board (EPPRB). | | | | |
| §126-114-14. Procedures for initiating a New Content Specialization (Educator Preparation Program (EPP) of Study). | | | | |
| §126-114-15. Procedures for WVBE Approval for a Revised Educator Preparation (EPP) of Study. | | | | |
| §126-114-16. Procedures for WVBE Approval of a New Educator Preparation Program (EPP) Provider Not Currently Approved to Offer Educator Preparation Programs (EPPs) of Study Leading to Licensure. | | | | |

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| §126-114-17. Procedures for Initiating and Evaluating a Pilot Program. |
| §126-114-18. Educator Preparation Program (EPP) Approval Waiver. |
| §126-114-19. Technical Assistance. |
| §126-114-20. Federal Monitoring. |
| §126-114-21. Severability. |