



**Karen B. Salmon, Ph.D.**  
State Superintendent of Schools

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**TO:** Members of the State Board of Education

**FROM:** Karen B. Salmon, Ph.D.

**DATE:** June 20, 2018

**SUBJECT:** COMAR 13A.12.01.08-1  
*Adjunct Certificate*  
**ADOPTION**

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**PURPOSE:**

The purpose of this item is to request permission to adopt the new Code of Maryland Regulations (COMAR) 13A.12.01.08-1 *Adjunct Certificate*. New regulatory language has been introduced to provide local education agencies (LEAs) the ability to request an adjunct certificate for individuals with highly specialized content expertise (e.g., engineers, physicists, medical providers, artists) interested in teaching on a part-time basis in the classroom as a teacher of record.

**REGULATION PROMULGATION PROCESS:**

Under Maryland law, a state agency, such as the State Board of Education (SBOE), may propose a new regulation whenever the circumstances arise to do so. The SBOE shares joint authority with the Professional Standards and Teacher Education Board (PSTEB) to develop regulations governing teacher certification and preparation. When the SBOE initiates a regulatory change concerning certification, the PSTEB must review the proposed regulation. If a majority of the PSTEB members approve of the regulation, the regulation promulgation process continues. If a majority of the PSTEB members disapprove of the proposed regulation, the regulation will not move forward unless approved by a super-majority of the SBOE (three-fourths of its members).

After the PSTEB has voted to approve the regulation (or three-fourths of the State Board has voted to approve the regulation despite the PSTEB's disapproval), the proposed regulation is sent to the Administrative, Executive, and Legislative Review Committee (AELR) for a 15-day review period. If the AELR Committee does not hold up the proposed regulation for further review, it is published in the Maryland Register for a 30-day public comment period. At the end of the comment period, the Maryland State Department of Education (MSDE) staff reviews and summarizes the public comments, which are presented to the PSTEB and the State Board. Thereafter, MSDE staff will present a recommendation to the State Board to either: (1) adopt the regulation in the form it was proposed; or (2) revise the regulation and adopt it as final because the suggested revision is not a substantive change; or (3) revise the regulation and re-propose it because the suggested revision is a substantive change. At any time during this process, the AELR Committee may stop the promulgation process and hold a hearing. Thereafter, it may recommend to the Governor that the regulation not be adopted as a final regulation or the AELR Committee may release the regulation for final adoption. The State Board, as the originating board, would then vote to formally adopt the regulation.

**HISTORICAL BACKGROUND:**

During the 2016 Maryland legislative session, Anne Arundel County sponsored House Bill 617- Adjunct Instructor Program, allowing the Anne Arundel County Board of Education (AABOE) to issue an adjunct certificate to an individual who is employed to teach part time in an area identified by AABOE as requiring a content expert. This bill did not pass; however, many LEAs expressed interest in the idea of an adjunct certificate. Given the recently proposed legislation, the certification subcommittee of the Teacher Induction, Retention, and Advancement Act (TIRA) was charged with exploring the concept of an adjunct certificate.

The Committee found that several states have developed an adjunct certification to allow content experts the opportunity to share their expertise in the classroom. For example:

- South Carolina currently offers an adjunct certificate to individuals who hold a bachelor's degree and either have a major in, or pass the Praxis subject assessment in a South Carolina certificate area, as well as, provides verification of five years of occupational experience in the content field of the certification area; and
- Georgia offers an adjunct certificate in all trades and industry fields, as well as, healthcare sciences, to individuals with an associate's degree and two years of occupational experience who hold an applicable industry license. Additionally, Georgia allows an individual with a bachelor's degree in any major, and two years of applicable occupational experience, to qualify for an adjunct certificate in one of several identified shortage areas.

The TIRA workgroup recognized that Maryland LEAs are not currently able to offer specialty and professional technical programs in critical staffing shortage areas. Current certification regulations do not allow an LEA the flexibility to place individuals with highly specialized content expertise, whom are interested in teaching on a part time basis, in the classroom as a teacher of record unless they are issued a conditional certificate. Conditional certificates are designed for an individual who is working toward professional certification as a full time teacher of record. The committee agreed that an adjunct certificate should be developed, but be limited in scope and designed to meet the needs of the LEA in which the individual is employed.

In order to assure high quality instruction, the workgroup recommended that LEAs provide mentoring, co-teaching opportunities, and professional development to individuals who receive an adjunct certification. At a minimum, it was recommended that candidates hold a bachelor's degree in a related content area, provide five years of successful occupational experience, and hold an industry credential, if applicable.

Based on the recommendation of the TIRA workgroup, the MSDE proposed new regulatory language creating a new certificate called the adjunct certificate.

The State Board granted permission to publish this regulation at the January 30, 2018 State Board meeting. On February 1, 2018, the PSTEB granted permission to publish the proposed amendments to COMAR 13A.12.01.08-1 *Adjunct Certificate*. On April 27, 2018, the proposed regulations were published in the Maryland Register (Attachment I) through May 29, 2018. The MSDE received thirteen public comments which are summarized in the attached chart (Attachment II).

Based on comments received, the MSDE is not making any recommended changes to COMAR 13A.12.01.08-1 *Adjunct Certificate* because the majority of the comments appear to refer to COMAR 13A.12.02.15 *Professional Technical Education* transcript analysis requirements. These regulations are not currently open for comment. The MSDE is currently undertaking a comprehensive review of all certification requirements and will consider these comments moving forward. Furthermore, several comments expressed concern about the potential for limiting the number of Professional Technical Education (PTE) teachers due to the Bachelor's degree requirement. Code of Maryland Regulation 13A.12.02.15 *Professional Technical Education* includes two routes to professional certification that do not require a Bachelor's degree.

**PROPOSED AMENDMENTS:**

The proposed regulatory language establishes the eligibility criteria for the issuance of the Adjunct Certificate, requires the LEAs to provide specific support and professional development to an individual who holds an adjunct certificate, and establishes the limitations of the certificate. The following criteria defines the professional development and support an LEA would be required to provide to an individual who holds an adjunct certificate:

Eligibility Criteria:

- Hold a minimum of a bachelor's degree from an accredited university/college
- Hold industry licensure, when applicable, for that profession
- Have five years of successful experience in the field

Local education agencies would be required to provide the following to those individuals who hold an adjunct certificate:

- Mentoring
- The opportunity to participate in side-by-side coaching or co-teaching with a professionally-certified educator and professional development prior to entry into the classroom and throughout the school year
- Regular evaluations

Certificate limitations:

- Non-transferable
- Part-time
- One-year validity period
- Renewable, upon the request of an LEA
- Issued by the MSDE

**SUMMARY:**

New regulatory language COMAR 13A.12.01.08-1 has been proposed to address the LEA's continuing need to hire individuals with highly specialized content expertise interested in teaching on a part-time basis, as a teacher of record. Specific regulatory language establishes the eligibility criteria for the issuance of the certificate, requires the LEAs to provide specific support and professional development to an individual who holds an adjunct certificate, and establishes the limitations of the certificate.

**ACTION:**

Request permission to adopt the new COMAR 13A.12.01.08-1 *Adjunct Certificate*.

Attachments (2)

*professional certificate, if the requirements under Regulation .08-1 of this chapter are satisfied.*

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State Superintendent of Schools

*bearing course work, with a grade of C or better, in English language arts.*

E. (text unchanged)

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## Subtitle 12 CERTIFICATION

### 13A.12.01 General Provisions

Authority: Education Article, §§2-205, 2-303(g), and 6-701—[6-705] 6-706, Annotated Code of Maryland

#### Notice of Proposed Action

[18-109-P]

The Maryland State Board of Education proposes to amend Regulation .05 under **COMAR 13A.12.01 General Provisions**. This action was considered at the January 30, 2018, meeting of the State Board of Education and the February 1, 2018, meeting of the Professional Standards and Teacher Education Board.

#### Statement of Purpose

The purpose of this action is to allow those individuals seeking certification in professional and technical education who do not hold a bachelor's degree to have the ability to present credit-bearing course work to fulfill the basic skills requirement in lieu of an assessment.

#### Comparison to Federal Standards

There is no corresponding federal standard to this proposed action.

#### Estimate of Economic Impact

The proposed action has no economic impact.

#### Economic Impact on Small Businesses

The proposed action has minimal or no economic impact on small businesses.

#### Impact on Individuals with Disabilities

The proposed action has no impact on individuals with disabilities.

#### Opportunity for Public Comment

Comments may be sent to Sarah Spross, M.Ed., Assistant State Superintendent, Division of Educator Effectiveness, Maryland State Department of Education, 200 West Baltimore Street, Baltimore, Maryland 21201, or call 410-767-0385 (TTY 410-333-6442), or email to sarah.spross@maryland.gov, or fax to 410-333-8963. Comments will be accepted through May 29, 2018. A public hearing has not been scheduled.

#### Open Meeting

Final action on the proposal will be considered by the State Board of Education during a public meeting to be held on June 19, 2018, 9 a.m., at 200 West Baltimore Street, Baltimore, Maryland 21201.

#### .05 General Requirements for Professional Certificates.

A.—C. (text unchanged)

D. Exceptions. An applicant who does not possess a bachelor's or higher degree for certification in a [career] *professional* and [technology] *technical* education area or a *specialized professional area* which does not require a bachelor's degree is required to submit:

(1) [evidence] *Evidence* of qualifying scores as established by the State Superintendent of Schools on [the] *a basic skills* teacher certification [tests] *test* approved by the State Board of Education[.]; or

(2) *3 semester hours of credit-bearing course work, with a grade of C or better, in math content and 3 semester hours of credit-*

## Subtitle 12 CERTIFICATION

### 13A.12.01 General Provisions

Authority: Education Article, §§2-205, 2-303(g), and 6-701—[6-705] 6-706, Annotated Code of Maryland

#### Notice of Proposed Action

[18-110-P]

The Maryland State Board of Education proposes to adopt new Regulation .08-1 under **COMAR 13A.12.01 General Provisions**. This action was considered at the February 27, 2018, meeting of the State Board of Education and at the February 1, 2018, meeting of the Professional Standards and Teacher Education Board.

#### Statement of Purpose

The purpose of this action is to provide local education agencies the ability to request an adjunct certificate for individuals with highly specialized content expertise who are interested in teaching on a part-time basis.

#### Comparison to Federal Standards

There is no corresponding federal standard to this proposed action.

#### Estimate of Economic Impact

The proposed action has no economic impact.

#### Economic Impact on Small Businesses

The proposed action has minimal or no economic impact on small businesses.

#### Impact on Individuals with Disabilities

The proposed action has no impact on individuals with disabilities.

#### Opportunity for Public Comment

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#### Open Meeting

Final action on the proposal will be considered by the State Board of Education during a public meeting to be held on June 19, 2018, 9:30 a.m., at 200 West Baltimore Street, Baltimore, Maryland 21201.

#### .08-1 Adjunct Certificate.

A. *The Maryland State Department of Education may issue an adjunct certificate upon the request of a local school system superintendent or an education director of a nonpublic school approved under COMAR 13A.09.10.*

B. *The request for adjunct certification must include:*

(1) *The name and credentials of the individual;*

(2) *The course name and content to be taught; and*

(3) *An explanation as to why the position cannot be filled by a qualified certificate holder.*

C. *The Adjunct Certificate is nontransferrable between local school systems.*

D. A local school system shall not employ an individual who holds an Adjunct Certificate as a full-time employee of the local school system.

E. An applicant for an Adjunct Certificate shall:

(1) Hold a bachelor's or higher degree from an IHE;

(2) Hold an industry license, when applicable for the profession; and

(3) Have 5 years of satisfactory occupational experience in the field to be taught.

F. An individual who is issued an Adjunct Certificate shall be provided with the following, by the employing local school system:

(1) A professionally certificated mentor;

(2) Side-by-side coaching or co-teaching with a professionally certificated teacher;

(3) A minimum of 45 hours of professional development, with 30 hours delivered prior to entry to the classroom and the remainder to be delivered throughout the school year; and

(4) Evaluations of teacher effectiveness.

G. The Adjunct Certificate issued in accordance with this regulation is valid for a 1-year period and may be renewed upon the request of the local school system.

KAREN B. SALMON, Ph.D.  
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**Subtitle 12 CERTIFICATION**

**13A.12.03 Specialists**

Authority: Education Article, §§2-205, 2-303(g), 6-103, and 6-701—6-706, Annotated Code of Maryland

**Notice of Proposed Action**  
[18-111-P]

The Maryland State Board of Education proposes to amend Regulation .04 under COMAR 13A.12.03 Specialists. This action was considered at the January 30, 2018, meeting of the State Board of Education and the December 7, 2017, meeting of the Professional Standards and Teacher Education Board.

**Statement of Purpose**

The purpose of this action is to clarify language and permit any number of years of specialist experience to be substituted for teaching experience for pupil personnel workers.

**Comparison to Federal Standards**

There is no corresponding federal standard to this proposed action.

**Estimate of Economic Impact**

The proposed action has no economic impact.

**Economic Impact on Small Businesses**

The proposed action has minimal or no economic impact on small businesses.

**Impact on Individuals with Disabilities**

The proposed action has no impact on individuals with disabilities.

**Opportunity for Public Comment**

Comments may be sent to Sarah Spross, M.Ed., Assistant State Superintendent, Division of Educator Effectiveness, Maryland State Department of Education, 200 West Baltimore Street, Baltimore, Maryland 21201, or call 410-767-0385 (TTY 410-333-6442), or email to sarah.spross@maryland.gov, or fax to 410-333-8963. Comments will be accepted through May 29, 2018. A public hearing has not been scheduled.

**Open Meeting**

Final action on the proposal will be considered by the State Board of Education during a public meeting to be held on June 19, 2018, 9 a.m., at 200 West Baltimore Street, Baltimore, Maryland 21201.

**.04 Pupil Personnel Worker.**

The requirements for certification as a pupil personnel worker are that the applicant shall have:

A.—B. (text unchanged)

C. 3 years of satisfactory teaching experience, or, at the recommendation of a local superintendent of schools, [2 years of] related experience may be substituted for [2 years of] teaching experience; and

D. (text unchanged)

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**Title 15  
DEPARTMENT OF  
AGRICULTURE**

**Subtitle 14 BOARD OF VETERINARY  
MEDICAL EXAMINERS**

**15.14.01 Standards of Practice and Code of Ethics for the Practice of Veterinary Medicine in the State**

Authority: Agriculture Article, §§2-103, 2-304, and 2-310, Annotated Code of Maryland

**Notice of Proposed Action**  
[18-114-P]

The Secretary of Agriculture proposes to amend Regulation .12-1 under COMAR 15.14.01 Standards of Practice and Code of Ethics for the Practice of Veterinary Medicine in the State.

**Statement of Purpose**

The purpose of this action is to require a veterinarian to examine a patient at least once a year before renewing prescription medications for chronic conditions.

**Comparison to Federal Standards**

There is no corresponding federal standard to this proposed action.

**Estimate of Economic Impact**

**I. Summary of Economic Impact.** Requiring veterinarians to monitor the medications they prescribe to chronically ill animals to ensure it is appropriate will lead to improved prescribing protocol that will better safeguard both animal and human health. The economic impact to veterinarians is unknown, but may result in more frequent visits by clients. The economic impact to the pet owner is unknown as the cost of an extra visit varies among veterinarians and regions of the state. There is no economic impact to citizens and residents who do not own pets with chronic conditions.

**II. Types of Economic Impact.**

Revenue (R+/R-)	Expenditure (E+/E-)	Magnitude
	)	

A. On issuing agency: (R-) Unknown

**COMAR 13A.12.01.08-1 - Comments Submitted**

<b>Commenter(s)</b>	<b>Comment</b>	<b>MSDE Comment</b>
<p>Alisha Marchewka Baltimore City School Teacher and Parent</p>	<p>These regulations will make it easier for districts and schools to hire untrained, uncertified ‘artists’ to teach children, rather than certified art teachers in an effort to save money. I implore the Maryland State Board of Education to consider that Art Teachers ARE in fact ARTISTS that chose to teach children, and went to college to gain the appropriate training to do so because of their passion to work with youth.</p> <p>I am afraid that these regulations will be a pathway for schools to push out ‘more expensive’, trained art teachers and hire ‘less expensive’, uncertified, part time, adjunct artists instead. This will ultimately hurt our children’s art education the most. They will not have the quality, scaffolded arts education they deserve from certified, experienced arts teachers. I ask that you consider vetoing these regulations. They are not good for children. They are not good for teachers. And they are not good for the future of the arts in Maryland.</p>	<p>The purpose of this regulation is to establish the pathway for an individual with highly specialized content expertise and are interested in teaching on a part time basis. Furthermore, this type of certificate is designed for a specialized part time position that can not be filled by a qualified certificate holder.</p>
<p>Karen Howard Baltimore City School Teacher</p>	<p>I have been a visual art teacher in Baltimore City Schools for thirteen years. City art teachers are a diverse group of highly educated and dedicated professionals that are being betrayed by a water down approach to education. This back-door approach to certification offered in the COMAR changes is an offense to all Highly Qualified art teachers. If an adjunct instructor or professional artist wishes to teach in K-12 then they have the option to earn a degree and begin their career.</p> <p>Using adjuncts and professional artist to teach the Fine Arts devalues the k-12 model of education. This plan betrays the students who are most in need. The students who frequently need the most help. The poor and students of color. Rather than continue to offer the best to these students, your proposed "Changes to COMAR" instead takes power away from the practitioners of K-12 education, teachers and researchers. It creates an ugly hierarchy within education that mirrors the increasingly gross divide within American society. The only reason to do so is to hire teachers for less pay.</p> <p>Our school systems have become increasingly reliant upon temporary and disposable teachers. This approach is designed to violate the actual goals of learning, which are charged to the teacher and researcher. The work I do is important, it's what I was trained to do. I ask that you consider vetoing these regulations. They are not good for children. They are not good for teachers. And, they are not good for the future of the arts in Baltimore City or Maryland.</p>	<p>The purpose of this regulation is to establish the pathway for an individual with highly specialized content expertise and are interested in teaching on a part time basis. Furthermore, this type of certificate is designed for a specialized part time position that can not be filled by a qualified certificate holder.</p>

<p>Lawrence A. Shulman Senior Counsel Shulman Rogers</p> <p>Tony Crane Owner Efficient Home LLC</p> <p>Mark Drury VP Business Development Shapiro &amp; Duncan, Inc.</p> <p>Dr. Marshall Greenblatt President Marian Greenblatt Education Fund</p> <p>Joe Kessler Managing Partner Next-Stage Development Group</p> <p>M. Jane Markley, RN, Med, FACHE President M. Jane Markley Consulting LLC</p> <p>Howard Menditch Partner and Managing Member Menditch Homes, LLC</p> <p>Rob Minnick President Minnick's, Inc.</p> <p>John O'Donnell President &amp; CEO W ANADA</p> <p>Harold Redden Vice President Fitzgerald Auto Malls</p> <p>Leo Schwartz President Edgewood Builders</p>	<p>This is a good start, but this alternative is limited to such an extent that it will have very minimal impact. As proposed, this option applies only to individuals who hold a bachelor's degree, so it excludes the whole range of professionals, such as plumbers and HVAC experts, who have real-world experience in their occupations, even if they have not graduated from college. In addition, the proposed regulation limits the scope of the contributions that individuals with adjunct certificates could make by limiting this pathway only to "part-time teachers" and requiring a professionally certified teacher to provide side-by-side coaching or co-teaching. Unless these provisions are amended, Maryland will unnecessarily perpetuate the obstacles that are and have been for years contributing to critical shortages in career and technical education teachers, which, in turn, are limiting our schools' ability to expose students to the skills they will need to pursue careers in a wide array of rewarding professions.</p>	<p>The coursework, experience, and industry licensure requirements for PTE teachers are found in 13A12.02.15, which is not currently open for comment. MSDE is currently undertaking a comprehensive review of all certification requirements and will consider these comments as we move forward.</p> <p>It is important to note that there are 2 routes to professional certification as a PTE teacher that do not require a bachelor's degree. These options may be found in COMAR 13A.12.02.15.</p>
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<p>Montgomery County Chamber of Commerce (MCCC)</p>	<p>It is our hope that the State supports automotive technicians, pilots, carpenters, IT professionals, plumbers, or nurses, who are licensed in their current occupation, and who want to teach in our schools. Unfortunately, the state's long-standing teacher certification requirements inhibit those efforts by impeding schools from hiring experienced career professionals to teach students in their areas of expertise. In addition, the proposed changes would add an adjunct certification option for career professionals. As proposed, this option applies only to individuals who hold a bachelor's degree, so it excludes the whole range of professionals, such as plumbers and HVAC experts, who have real-world experience in their occupations, even if they have not graduated from college. Unless the aforementioned provisions are amended, Maryland will unnecessarily perpetuate the obstacles that are contributing to critical shortages in career and technical education teachers. By removing these obstacles, and not creating additional barriers, we ensure access to talent which will meet employers' needs in a regional, national, and global economy</p>	<p>There are currently 2 routes to professional certification as a PTE teacher that do not require a bachelor's degree. These options may be found in COMAR 13A.12.02.15.</p> <p>The coursework, experience, and industry licensure requirements for PTE teachers are found in 13A.12.02.15, which is not currently open for comment. MSDE is currently undertaking a comprehensive review of all certification requirements and will consider these comments as we move forward.</p>
<p>Kimberly Hill, Superintendent-Charles County Public Schools</p>	<p>On behalf of Charles County Public Schools, we would like to add our support to the position of PSSAM provided in the May 15 letter from PSSAM President Dr. D'Ette Devine.</p> <p><b>Heating, Ventilation and Air Conditioning.</b> Our instructor for Heating, Ventilation, and Air Conditioning is also the team leader for our CTE programs at the Robert D. Stethem Educational Center. He holds a Master HVAC Certification and is a certified instructor through NCCER and in <b>Solar Energy</b>. In addition to teaching at Stethem, he is the Acting Director at the Center for Employment Training in Alexandria Virginia, a trade skills job-training program for adults. He has over 30 years of experience in the HVAC Trade and more than 20 years of teaching experience.</p> <p>Because he is unable to pass the Praxis Writing portion, our instructor is a long-term substitute. Additionally, he does not qualify for health benefits. One of his students won a silver medal at the Skills USA Maryland State Championships. From this, he has secured a job in the trade from a local company. One has been accepted into Virginia Apprentice School: a trade's continuing education program. All of the students have received one or more of the certifications in the program. Nine students currently have internships in the HVAC industry. He coordinates a very active Program Advisory Council that make meaningful connections for students and ensure that the program is industry aligned.</p> <p><b>Automotive Technology</b> Our Automotive Technology instructor is an ASE Certified Master Mechanic with 40 years of experience in the industry. He is an adjunct professor with the Prince Georges County Community College. Our instructor is a long-term substitute. He</p>	<p>The coursework, experience, and industry licensure requirements for PTE teachers are found in 13A.12.02.15, which is not currently open for comment. MSDE is currently undertaking a comprehensive review of all certification requirements and will consider these comments as we move forward.</p>



	<p>does not qualify for health benefits. All of his students have received one or more certifications that are aligned to the industry. He has added a high level of rigor to the courses and positively impacted the program by creating career connections and achieving National Automotive Technician Education Foundation (NATEF) certification for the program, instructor and students.</p> <p><b>Culinary Arts</b> Our instructor for Culinary Arts is a graduate of the Pennsylvania Institute of Culinary Arts/Le Cordon Bleu. He has more than 25 years of experience as an Executive Chef. He was instrumental in getting the Culinary Arts program American Culinary Federation (ACF) certified. He is currently an ACF Certified Executive Chef and an ACF Certified Culinarian and an ACF Certified Secondary Culinary Educator. Our instructor spent two years on the conditional teacher pay scale. He took a significant pay cut to assume this role. He took the Praxis Core thirteen times; covering the cost of the test himself. He has finally passed however, he would have had to resign at the end of this year if he did not pass and was able to achieve teacher certification and pay.</p> <p><b>Collision Repair</b> Our Instructor for Collision Repair has 26 years of experience in the Auto Industry. He is the owner of a successful Collision Repair business. He is ASE Master Certified, and holds 15 i-Car Curriculum Training Certifications. He is Environmental Protection Agency (EPA) 40 CFR Certified. He is Universal Certified for HVAC &amp; Refrigerant from Penn State University. He holds the highest level of certification with Pittsburgh Plate Glass (PPG) for automotive refinishing. He is a first-year teacher that is on the conditional pay scale until he passes four education courses and the Praxis Core in Reading, Writing and Math. He is approaching the end of his first year and is very concerned about the feasibility of him being able to complete all of the requirements in the specified timeframe. In addition to teaching new courses and getting acclimated to the educational environment, he has to prepare to take college courses and pass the required exams.</p> <p>We strongly believe that alternate standards should be adopted for the instructors in our CTE programs that are focused on certifications and experience in their field. We urge you to review the current COMAR standards with an eye towards expanding the eligibility of quality instructors by valuing their expertise and real world experience that is vital for our students to be successful in the field.</p>	
Jack Smith, Superintendent- MCPS	On behalf of Montgomery County Public Schools (MCPS), we would like to add our support to the position of the Public Schools Superintendents Association of Maryland (PSSAM). MCPS previously has urged the Maryland State Department of Education to address this issue. While we welcome the proposed changes to the Code of Maryland Regulations (COMAR) that currently are pending, we do not think they go far enough to address the certification hardships experienced by some of our Career and Technical Education (CTE) teachers. Below we provide a number of specific examples for your consideration.	The coursework, experience, and industry licensure requirements for PTE teachers are found in 13A12.02.15, which is not currently open for comment. MSDE is currently undertaking a comprehensive review of all certification requirements and will

	<p><b>Heating Ventilation and Air Conditioning:</b> An individual was hired to serve as a teacher in the Heating, Ventilation, and Air Conditioning (HVAC) program. This individual held industry certification, and was highly successful in his career, but he wanted to give back to the community by serving as a teacher. He was hired with a provisional license and allowed two years to complete all the certification requirements. He was highly successful in his instruction of the students in the HVAC courses. In fact, under his leadership, students achieved at higher levels, completing more industry certifications than earned under the instruction of all prior HVAC teachers, and the enrollment in the program increased. However, he was unsuccessful at passing the required Praxis exam. The fact that students achieved at higher levels and enrollment increased, as well as his industry certification and state licensure, should have been sufficient to validate his status as a successful teacher. Passing the Praxis exam is unattainable for many prospective, and otherwise skilled and qualified, CTE teachers. In recognition of the skills gap in today's workforce, the community desperately needs industry professionals to lead CTE education.</p> <p><b>Cosmetology:</b> A Licensed Senior Cosmetologist is serving as an instructor for one of the Cosmetology programs. She entered MCPS directly from the industry. Unfortunately, she also was unsuccessful in passing the required Praxis exam. She has been out of school and working in the industry for many years. After months of tutoring, she was able to pass the reading and English sections of the Praxis exam; however, she has had major difficulties in passing the math section. Because of her desire to continue to teach the students she serves, her only option is to serve as a long-term substitute. While serving as a Cosmetology instructor, she has increased enrollment in the program and enabled many students to finish the program and pass the state boards to become licensed cosmetologists. The instructor's ability to teach and equip students with the skills needed to be successful in this industry does not rest on her ability to do higher level math. Her ability to teach, motivate, and equip students with skills needed for postsecondary success has been evident. It would be extremely unfortunate for MCPS to lose a highly qualified licensed instructor, because of the Praxis exam requirement.</p> <p><b>Health Professions</b> Two registered nurses and a nurse practitioner, hired two years ago to teach courses in our Academy of Health Professions at Thomas Edison High School of Technology and Watkins Mill High School, were required to take four teacher certification courses, as well as the Praxis exam, during their first two years. This was a challenge for three reasons:</p> <ol style="list-style-type: none"> <li>(1) As a new teacher, planning and collaborating and teaching is a large task; the additional time and workload of taking a course every semester made this very difficult.</li> <li>(2) The teachers signed up to take courses, and the universities dropped the courses at the start of semesters; at that point, finding another course that fulfilled the requirements was not always possible.</li> <li>(3) Preparing for a Praxis exam also takes significant time. For this reason, the Praxis exam</li> </ol>	<p>consider these comments as we move forward.</p>
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	<p>only adds to the burden of taking teacher certification courses.</p> <p>MCPS strongly encourages the Maryland State Department of Education to take the straightforward path proposed by PSSAM of simply accepting an individual's successful completion of licensing requirements under state law as sufficient for certification to teach in that individual's career area of expertise. Highly experienced and master certified individuals willing to leave the industry to teach high school students are difficult to find. We urge you to review the current COMAR standards to place a higher value on industry expertise to secure quality instructors for our students' successful futures.</p>	
<p>D'Ette Devine, President PSSAM</p>	<p>We applaud the intent of these proposed changes to expand opportunities to promote career readiness among our state's students. Nevertheless, we believe that the proposed changes do not go far enough to reduce barriers to entry for hiring talented career professionals. To the contrary, they impose new requirements that may, in fact, be counterproductive. In our view, there should be absolutely no bar to hiring experienced career professionals, who are already licensed under state law in their occupations, to educate our students in their fields of expertise; for example, a plumber, licensed by the State Board of Plumbing, or a Heating, Ventilation, Air Conditioning and Refrigeration (HY AC) expert, licensed by the State Board of Heating, Ventilation, Air Conditioning and Refrigeration. Yet, it is increasingly difficult to provide our students the opportunity to benefit from real-world experiences from such individuals, if they are also required to pass standardized tests, such as the PRAXIS, and meet other certification standards applicable to teachers' academic subject matter.</p> <p>The proposed COMAR revisions are flawed in at least three critical ways:</p> <p>1) The proposed changes to COMAR 13A.12.01.05 (General Requirements for Professional Certificates) do not take the straightforward path of simply accepting an individual's successful completion of licensing requirements under state law as sufficient for certification to teach in that individual's career area of expertise. While the proposed changes do provide an alternative to passing the PRAXIS, the option sets a very high bar. Specifically, the proposed alternative requires 3 semester hours of credit-bearing course work with a grade of C or better in math content, and 3 semester hours of credit-bearing course work with a grade of C or better in English language arts. This requirement would be difficult to fulfill for many successful professionals in fields such as HVAC and plumbing, for example. It would be more appropriate to limit the criteria for career and technical education teachers to licensure and real-world experiences in the relevant fields, which typically provide as much applied mathematics, problem-solving, and reading and writing skills as any college courses.</p> <p>2) The proposed changes to COMAR 13A.12.01.05 (General Requirements for Professional Certificates) apply only to specialized professional areas that do not require a bachelor's</p>	<p>There are currently 2 routes to professional certification as a PTE teacher that do not require a bachelor's degree. These options may be found in COMAR 13A.12.02.15.</p> <p>The coursework, experience, and industry licensure requirements for PTE teachers are found in 13A.12.02.15, which is not currently open for comment. MSDE is currently undertaking a comprehensive review of all certification requirements and will consider these comments as we move forward.</p>

	<p>degree. Again, this requirement is unnecessarily limiting. For example, a registered nurse must have a bachelor's degree in Maryland and, therefore, would not benefit from this change. This is counterproductive because we should welcome any registered nurse who wants to teach in a career pathway program rather than prohibiting her from being hired simply because she cannot either: (a) pass the PRAXIS, or (b) meet course hour and grade requirements in mathematics and English language arts. Accordingly, this alternative pathway to certification should be expanded to encompass all individuals who meet state licensure requirements in the specialized field of instruction, regardless of whether a bachelor's degree is required.</p> <p>3) The proposal to adopt COMAR 13A.12.01.08-1 (Adjunct Certificate) is even more restrictive. The new provision is intended to create a one-year adjunct certificate to provide flexibility to place individuals with specialized content expertise in the classroom as teachers. Yet, the new provision is limited only to individuals who hold a bachelor's degree, so it cannot be applied to the whole range of professionals, such as plumbers and HVAC experts, who have a wealth of real-world experiences in their chosen profession, even if they have not graduated from college. Moreover, the proposed regulation was altered by the Professional Standards and Teacher Education Board (PSTEB) to limit these adjunct certificate positions to be part-time only. PSTEB's amendments would also require a professionally certified teacher to provide side-by-side coaching or co-teaching, which is a very resource-intensive proposition for school districts.</p>	
D'Ette Devine, Superintendent- Cecil County Public Schools	On behalf of the Cecil County Public Schools, I would like to take this opportunity to support [PSSAM Letter] regarding proposed changes to the Code of Maryland Regulations (COMAR) that are currently pending. The current regulations have created barriers in effectively hiring instructors in Cecil County. Several welding instructors declined this position citing significant certification requirements. There are additional difficulties locating appropriate courses in a reasonable proximity.	The coursework, experience, and industry licensure requirements for PTE teachers are found in 13A12.02.15, which is not currently open for comment. MSDE is currently undertaking a comprehensive review of all certification requirements and will consider these comments as we move forward.
Eileen Mross Unknown Affiliation	I am writing to express my rejection to the proposed changes to allow for hiring non-certified teachers without proper degrees to serve as adjunct employees & allowing them to teach in our schools.	
Caitlin Curtis Recent MICA Graduate	I am a recent graduate from MICA and I am a professional artist. I have my undergrad BFA degree in art education and my MFA in studio art. I am freelancing and working currently to find a full-time position as an educator. As soon as I saw the proposed changes to COMAR I was deeply hurt by the fact that the MD State Department of Education would	The purpose of this regulation is to establish the pathway for an individual with highly specialized content expertise and are

	<p>even consider hiring adjunct faculty.  <b>IT IS THE WORST IDEA YOU COULD EVER PUT INTO ACTION!</b>  Hiring adjunct faculty is just another way to disadvantaged our students and our hard working educators. Why wouldn't you strive to find more full time employees who can actually get to know their students and have benefits provided for them by the state. Adjuncting is just another way to save money on your end leaving employees without the money they deserve and students without the support they need. Students need stability not a rotating educators that might not be as qualified. As a professional artist and a person who wants the children of this state to have the best educational experience possible, I DO NOT STAND BEHIND THIS CHANGE AT ALL.  Adjuncting would be a huge disadvantage to the hard working people who commit their lives to educating the youth and most importantly a huge huge disadvantage to the children who deserve the best.</p>	<p>interested in teaching on a part time basis. Furthermore, this type of certificate is designed for a specialized part time position that can not be filled by a qualified certificate holder.</p>
<p>Patricia Hunter, Art Teacher and Parent, Howard County Public Schools</p>	<p>I am absolutely against the proposed changes to COMAR. There is a surplus of art teachers in this state qualified to teach every aspect of art education. Last year Howard County had 152 qualified art teachers apply for only 9 positions! The art teachers in this state have gone through rigorous collegiate instruction to not only be amazing at art- and we are ALL professional artists- but we also took the time to learn how to teach. Allowing someone who can just paint- but has had no training in teaching- to come and teach our youth is wrong. We are teachers first and foremost. I do not want to see my fellow art teachers denied jobs because it is cheaper to hire someone who didn't bother- or worse was flagged at the collegiate level to NOT be allowed to teach due to behavior choices- to take their spot. I do not want my children in classrooms with people who do not have the necessary training to teach, no matter how beautiful they may be able to make a canvas. Schools are for trained teachers- do not open the door for random people to come damage our children.</p>	<p>The purpose of this regulation is to establish the pathway for an individual with highly specialized content expertise and are interested in teaching on a part time basis. Furthermore, this type of certificate is designed for a specialized part time position that can not be filled by a qualified certificate holder.</p>
<p>Glenn Goetzinger, Controls Department Manager- Smith Mechanical</p>	<p>This is a good start but this alternative is limited to such an extent that it will have very minimal impact. As proposed, this option applies only to those who hold a bachelor's degree, so it excludes the whole range of professionals, such as plumbers and HVAC experts, who have real world-experience in their occupations. In addition, it limits the scope of the contributions that individual with adjunct certificates could make by limiting this pathway only to "part-time teachers" and requiring a professional certified teacher to provide side by side coaching or co-teaching.</p>	<p>There are currently 2 routes to professional certification as a PTE teacher that do not require a bachelor's degree. These options may be found in COMAR 13A.12.02.15.</p> <p>The coursework, experience, and industry licensure requirements for PTE teachers are found in 13A12.02.15, which is not currently open for comment. MSDE is currently undertaking a comprehensive review of all</p>

		certification requirements and will consider these comments as we move forward.
Kelly Griffith, Superintendent-Talbot County Public Schools	Support PSSAM's position on the proposed changes. The current regulations have created artificial barriers in effectively hiring instructors for Career and Technology Pathway courses in Talbot County. Construction and Cabinet Making position was difficult to fill due to significant certification requirements. Our Automotive Technology Instructor is planning to retire soon and several potential instructors interested in the position are concerned about the significant certification requirements. There are additional difficulties locating appropriate courses in a reasonable proximity by being on the eastern shore.	The coursework, experience, and industry licensure requirements for PTE teachers are found in 13A12.02.15, which is not currently open for comment. MSDE is currently undertaking a comprehensive review of all certification requirements and will consider these comments as we move forward.