

TO: Members of the State Board of Education

FROM: Carey M. Wright, Ed.D., State Superintendent of Schools 

DATE: June 24, 2025

SUBJECT: COMAR 13A.07.01 *Comprehensive Teacher Induction Program*
PERMISSION TO PUBLISH

Executive Summary

The purpose of this item is to request permission to publish amendments to the Code of Maryland Regulations (COMAR) 13A.07.01 *Comprehensive Teacher Induction Program*. COMAR 13A.07.01 defines the requirements for Maryland teacher induction programs, including program implementation, mentorship, and evaluation and reporting. The current regulations were adopted in 2010 and were last amended in 2011.

Background and Process

Under Maryland law, a state agency, such as the SBOE, may propose an amendment to a regulation whenever the circumstances arise to do so. After the State Board votes to propose an amendment, the proposed regulation is sent to the Administrative, Executive, and Legislative Review (AELR) Committee 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. Thereafter, MSDE staff will present a recommendation to the SBOE 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. 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.

During the summer of 2023, the MSDE, in partnership with The New Teacher Center, established a Statewide Teacher Induction Workgroup comprised of representatives from the following entities:

- Public School Superintendents' Association of Maryland
- Maryland Independent College and University Association
- Maryland Association of Elementary School Principals
- Maryland Secondary School Principals
- Maryland State Education Association
- Baltimore Teachers' Union
- Teacher of the Year

- University System of Maryland
- Professional Standards and Teacher Education Board
- Accountability and Implementation Board

The Workgroup met on five occasions during the summer and fall of 2023. It ultimately made recommendations for evidence-based induction and mentoring practices that were found to increase student outcomes and teacher retention. Based on these recommendations, MSDE drafted amendments to COMAR 13A.07.01 and requested feedback from the following groups:

- Local education agencies
- Maryland educator preparation programs
- The Accountability and Implementation Board
- The Professional Standards and Teacher Education Board

On January 28, 2025, the SBOE granted permission to publish the recommended amendments. The regulations were published in the Maryland Register for 30 days beginning on May 19, 2025. Based on the public comments provided (enclosed), MSDE is recommending substantive changes to the amendments (see enclosed Summary of Public Comments with MSDE Recommendations).

Action Required

The MSDE is requesting permission to republish amendments to COMAR 13A.07.01, *Comprehensive Teacher Induction Program*.

Attachments

COMAR 13A.07.01 *Comprehensive Teacher Induction Program*

Public Comments

Summary of Public Comments with MSDE Recommendations

Title 13A STATE BOARD OF EDUCATION

Subtitle 07 SCHOOL PERSONNEL

Chapter 01 Comprehensive Teacher Induction Program

Authority: Education Article, §§2-205(c), 5-206-1, [and] 6-202(b), and 6-117, Annotated Code of Maryland

.01 Purpose and Scope.

This chapter applies to a comprehensive induction program for new teachers. The purpose of this regulation is to provide guidance for local school systems to establish a high quality induction program that addresses critical professional learning needs of new teachers, improves instructional quality, and helps inductees achieve success in their initial assignments, resulting in improved student learning and higher retention in the profession. [The induction program that each local school system designs shall reflect coherence in structure and consistency in focus to ensure an integrated, seamless system of support.] Recognizing that "one-size-fits-all" induction programs do not meet the needs of new teachers, these regulations establish the components of an induction program, allowing local school systems to build on their current programs.

.02 Incorporation by Reference.

In this chapter, the following documents are incorporated by reference:

- A. [Maryland Teacher Professional Development Standards] *Standards for Professional Learning (Learning Forward, 2022)*;
- B. [Maryland Teacher Professional Development Planning Guide (updated November 2008)] *InTASC Model Core Teaching Standards and Learning Progressions for Teachers 1.0 (Council of Chief State School Officers, 2013)*;
- C. [Maryland Teacher Professional Development Evaluation Guide, October 2008.] *Social Justice Standards: The Teaching Tolerance Anti-Bias Framework (Southern Poverty Law Center, 2018)*;
- D. *International Society for Technology in Education Standards for Educators (International Society for Technology in Education, 2024)*; and
- E. *Model Code of Ethics for Educators (National Association of State Directors of Teacher Education and Certification, 2023)*.

.03 Definitions.

A. In this chapter, the following terms have the meanings indicated.

B. Terms Defined.

- (1) "Mentee" means a public school teacher who [is the f recipient of] *receives* the services of a mentor.
- (2) "Mentor" means [an individual who possesses the attributes set forth in Regulation .06 of this chapter] *a highly competent teacher selected by the local school system who will work to instill in a mentee the skills and knowledge necessary for student success in accordance with Regulation .05 of this chapter.*
- (3) "New teacher" means a teacher who is:
 - (a) [New to the profession; or] *Professionally licensed and has less than three years of teaching experience; or*
 - (b) [A veteran who is new to the district] *Holds a Conditional License or Resident Teacher License.*
- (4) "Veteran teacher" means *a professionally licensed teacher who is new to the local school system and has three or more years of teaching experience.*

.04 [General] Programmatic Requirements.

A. Each local school system shall establish and maintain a comprehensive induction program for all new teachers *that is at least three years in duration.*

B. *Each local school system shall establish and maintain a comprehensive induction program for all veteran teachers that is at least one year in duration.*

[B.] C. [The] *Each* comprehensive induction program shall be designed [to provide] *with a coherent structure and consistent focus to ensure an integrated, seamless system of support for participating teachers and provide them with the knowledge and skills necessary to be successful in their classrooms and schools [to enable] and prepare them to stay in the profession.*

[C. The content and structure of the comprehensive induction program shall be aligned with the Maryland Teacher Professional Development Standards set in December 2004.]

D. *A comprehensive induction program may be developed and implemented in collaboration with an institution of higher education.*

[D.]E. [The] *Each* comprehensive induction program shall include:

[(1) Standards for effective mentoring that:

- (a) Are focused;
- (b) Are systematic;
- (c) Are ongoing;
- (d) Are of high quality;
- (e) Are geared to the needs of each teacher; and
- (f) Include observations with feedback;

- (2) Before the school year begins, orientation programs for all teachers new to the local school system;
- (3) Ongoing support from a mentor, including regularly scheduled meetings during noninstructional time;
- (4) Regularly scheduled opportunities for new teachers to observe or co-teach with skilled teachers;
- (5) Follow-up discussions of the observations and co-teaching experiences;
- (6) Ongoing professional development designed to address new teacher needs and concerns and, for any teachers not on track to qualify for tenure at any formal evaluation point, additional professional development, as appropriate; and
- (7) Ongoing formative review of new teacher performance, including classroom observations, reviews of lesson plans, and feedback based on clearly defined teaching standards and expectations.]

- (1) *An initial orientation;*
- (2) *Ongoing participation in an educator professional learning community;*
- (3) *A plan for professional licensure, if applicable;*
- (4) *Specialized professional learning on the knowledge and skills new educators need that is aligned with the Maryland-recognized professional learning standards incorporated by reference in Regulation .02 of this chapter;*
- (5) *Professional learning on State and local school system initiatives and priorities, including the teacher evaluation system, career ladder for educators, and the College and Career Readiness Standards;*
- (6) *Professional learning and support for working with students with disabilities, multi-lingual learners, and differentiating instruction;*
- (7) *Professional learning for using technology in education aligned with the International Society for Technology in Education Standards for Educators incorporated by reference in Regulation .02 of this chapter*
- (8) *Review and assessment of the principles of the Model Code of Ethics for Educators incorporated by reference in Regulation .02 of this chapter;*
- (9) *Job-embedded individualized and differentiated mentoring;*
- (10) *Regularly scheduled opportunities for new teachers to observe and co-teach with skilled teachers, including follow-up discussions of the experiences;*
- (11) *Assistance for new teachers with planning instruction;*
- (12) *Observations of instruction with feedback;*
- (13) *Ongoing professional learning on the multi-tiered system of supports (MTSS) framework to support all students; and*
- (14) *A schedule aligned to the Career Ladder for Educators established in Md. Code Education §6-1003.*

[E.] F. [The local school systems shall consider the need for staffing to] *Each local school system may identify a program coordinator who will plan and facilitate induction activities by:*

- [(1) Plan and coordinate all induction activities;
- (2) Supervise new teacher mentors;
- (3) Communicate with principals and other school leaders about induction activities; and
- (4) Oversee the evaluation of the comprehensive induction program.]
- (1) *Communicating with principals and other school leaders about induction activities;*
- (2) *Building and maintaining partnerships with local institutions of higher education to ensure a seamless transition from graduation to induction; and*
- (3) *Overseeing the evaluation of the comprehensive induction program.*

[F.] G. [The comprehensive induction program may provide annual training for principals, assistant principals, and school-based professional development staff to familiarize them with the factors that contribute to teacher attrition and retention, the learning activities and schedule for induction program participants, the role of mentors and expectations for supporting mentors' work in schools, and the importance of school-level coordination of support for new teachers.] *The comprehensive induction program shall include ongoing professional learning for school leaders. Professional learning may address the following:*

- (1) *Retention strategies;*
- (2) *Creating the climate and systems for induction;*
- (3) *Working with mentors and new teachers; and*
- (4) *Aligning induction supports with local school system initiatives and strategies.*

[.05 Participation in the Comprehensive Induction Program.

A. All teachers new to the profession shall participate in all induction activities until they receive tenure. Veteran teachers, in their first year of teaching in the district, shall participate in induction activities.

B. To the extent practicable given staffing and fiscal concerns, local school systems shall consider the following options for first-year teachers:

- (1) A reduction in the teaching schedule; and
- (2) A reduction in, or elimination of, responsibilities for involvement in non-instructional activities other than induction support.]

[.06] .05 Mentoring Component of the Comprehensive Induction Program.

A. A local school system shall establish [a] *an instructional mentoring program as part of its Comprehensive Induction Program.*

B. [A local school system shall establish a cadre of full-time or part-time mentors to support teachers during their comprehensive induction period.] *The mentoring program shall provide individualized, instruction-focused, job-embedded support and mentoring that begins when a teacher is hired into the local school system.*

[C. To the extent practicable given staffing and fiscal concerns, local school systems shall establish the maximum ratio of mentors to mentees in the comprehensive induction program at one mentor to 15 mentees.]

C. *The mentoring program shall include standards for effective mentoring that are:*

- (1) *Focused;*
- (2) *Systematic;*
- (3) *Ongoing;*
- (4) *Of high quality;*
- (5) *Geared to the needs of each teacher; and*
- (6) *Include observations with feedback.*

D. [A mentor under the comprehensive induction program may be assigned school-level administrative duties only on an emergency basis.] *The mentoring program shall include mentoring activities related to the Five Core Propositions of National Board Certification focusing on planning, instructional practices, and analyzing student learning.*

E. *The mentoring program shall support new teachers in developing culturally relevant teaching practices for all students.*

F. *To the extent practicable given staffing and fiscal concerns, each new teacher shall receive at least ~~480~~ 400 minutes of mentoring per marking period.*

(1) A local school system and new teacher may mutually agree to a reduction in mentoring minutes per marking period if the new teacher achieves a rating of effective, or comparable, on a year-end evaluation.

(2) The reduction of mentoring minutes per marking period shall not be less than:

- (a) 300 minutes per marking period in year two of induction; and*
- (b) 200 minutes per marking period in year three of induction.*

[E. A mentor under the comprehensive induction program may not participate in the formal evaluation of a mentee.

F. Mentors shall:

- (1) Demonstrate knowledge of adult learning theory and peer coaching techniques;
- (2) Demonstrate a knowledge base and skills to address the performance evaluation criteria and outcomes to be met by each mentee; and
- (3) Hold an advanced professional certificate and be rated as a satisfactory or effective teacher or be a retiree from a local school system and have been rated as a satisfactory or effective teacher; and
- (4) Possess a positive reference from a current or recent building principal or supervisor that addresses the instructional, management, human relations, and communication skills of the mentor applicant.

G. Local school systems shall provide ongoing training for mentors that includes:

- (1) Initial training for each mentor prior to assuming the assignment on the essential characteristics of mentoring adults and the duties and responsibilities of a mentor;
- (2) Ongoing training and feedback to enable each mentor to address the specific and varied performance needs of mentees;
- (3) Models of effective instructional practices that address the identified needs of mentees; and
- (4) Identification and coordination of appropriate resources to address the performance needs of mentees.]

G. *Each local school system shall have a rigorous selection process for mentors that includes:*

~~(1) A demonstration of their instructional expertise through a performance task, submission of instructional data, or both;~~

~~(2)~~(1) *Assurance that the mentor holds:*

- (a) A Professional or Advanced Professional License; and*
- (b) At least an effective, or comparable, rating on the most recent local school system evaluation;*

~~(3)~~(3) *A recommendation from a school or district leader who previously or currently supervises the individual and can attest to their readiness for the mentor role; and*

~~(4)~~(4) *Once the Career Ladder is well established, prioritization of those teachers with a designation of Lead, Distinguished, or Professor Distinguished Teacher.*

H. *Each local school system shall establish a process for matching mentors and mentees that:*

- (1) Correlates licensure areas or grade bands, with the prioritization of the licensure area when possible; and*
- (2) Considers diversity markers to the extent practicable.*

I. *Local school systems shall provide initial and ongoing training for mentors that may include:*

- (1) Mentoring language and stances;*
- (2) Key practices of a mentor, including differentiation of support;*
- (3) Adult learning practices;*
- (4) Elements of instructional mentoring, such as observations, planning, and analyzing student work;*
- (5) Reflection on mentoring practice and communities of practice;*
- (6) Anti-bias pedagogy aligned with the Social Justice Standards incorporated by reference in Regulation .02 of this chapter; and*
- (7) Identification and coordination of appropriate resources to address the performance needs of mentees.*

J. *A mentor in the comprehensive induction program may not participate in the formal evaluation of a mentee.*

[.07] .06 Evaluation of the Comprehensive Induction Program.

A. Local school systems shall evaluate the effectiveness of the comprehensive induction program [and shall use the Maryland Teacher Professional Development Evaluation Guide, October 2008, as a resource for developing an evaluation model].

B. Each local school system induction program shall develop a comprehensive evaluation plan that includes:

- (1) Mentee and mentor perception data of their overall induction experience;
- (2) Mentee experience data regarding their work with their mentor;
- (3) Mentor experience data regarding their work with their mentee;
- (4) Evidence of program components aligned to the:
 - (a) Five Core Propositions of the National Board for Professional Teaching Standards, which are:
 - (i) Teachers are committed to students and their learning;
 - (ii) Teachers know the subjects they teach and how to teach those subjects to students;
 - (iii) Teachers are responsible for managing and monitoring student learning;
 - (iv) Teachers think systematically about their practice and learn from experience; and
 - (v) Teachers are members of learning communities; and
 - (b) Model Code of Educator Ethics; and
 - (c) InTASC Model Core Teaching Standards and Learning Progressions for Teachers 1.0;
- (5) Teacher growth data from the beginning to the end of the induction program as measured by the local school system teacher evaluation system;
- (6) Induction program participants' retention data; and
- (7) Evidence of the number of instructional-driven mentoring minutes every month.

[.08] .07 [Date of] Compliance and Reporting.

A. Local school systems shall be in full compliance with this chapter by July 1, [2011] 2027.

B. Local school systems shall provide a report to the Department by July 1, 2027 that includes:

- (1) A description of the comprehensive induction program demonstrating compliance with this chapter; and
- (2) An evaluation plan that meets the requirements under Regulation .07 of this chapter.

C. Local school systems shall provide a report to the Department beginning July 1, 2029, and every three years thereafter, that includes:

- (1) Mentee and mentor data, including:
 - (a) Mentee growth from the beginning to the end of the induction program;
 - (b) Teacher retention;
 - (c) The number of mentees participating in the comprehensive induction program; and
 - (d) The number of mentors assigned to teachers in the comprehensive induction program;
 - (e) The number of teachers who did not receive ~~the minimum number of at least 180 minutes of~~ mentoring minutes per marking period ~~month~~ under Regulation .05F of this chapter with an explanation of the reasons; and
- (2) The results of the evaluation of the comprehensive induction program developed under Regulation .06 of this chapter.

[.09 Reporting Requirements.

A. Local school systems shall include their comprehensive induction program report in their Bridge to Excellence Master Plan Annual Update to the Maryland State Department of Education.

B. This report shall include:

- (1) A description of the mentoring program;
- (2) Data, including the number of probationary teachers and the number of mentors who have been assigned; and
- (3) How they have measured the effectiveness of the program.]

CAREY M. WRIGHT, Ed.D.
State Superintendent of Schools

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[C. The content and structure of the comprehensive induction program shall be aligned with the Maryland Teacher Professional Development Standards set in December 2004.]

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[E. A mentor under the comprehensive induction program may not participate in the formal evaluation of a mentee.

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- (1) Demonstrate knowledge of adult learning theory and peer coaching techniques;
- (2) Demonstrate a knowledge base and skills to address the performance evaluation criteria and outcomes to be met by each mentee; and
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- (4) Possess a positive reference from a current or recent building principal or supervisor that addresses the instructional, management, human relations, and communication skills of the mentor applicant.

G. Local school systems shall provide ongoing training for mentors that includes:

- (1) Initial training for each mentor prior to assuming the assignment on the essential characteristics of mentoring adults and the duties and responsibilities of a mentor;
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- (1) Assurance that the mentor holds:*
 - (a) A Professional or Advanced Professional License; and*
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- (2) A recommendation from a school or district leader who previously or currently supervises the individual and can attest to their readiness for the mentor role; and*
- (3) Once the Career Ladder is well established, prioritization of those teachers with a designation of Lead, Distinguished, or Professor Distinguished Teacher.*

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- (1) Mentoring language and stances;*
- (2) Key practices of a mentor, including differentiation of support;*
- (3) Adult learning practices;*
- (4) Elements of instructional mentoring, such as observations, planning, and analyzing student work;*
- (5) Reflection on mentoring practice and communities of practice;*
- (6) Anti-bias pedagogy aligned with the Social Justice Standards incorporated by reference in Regulation .02 of this chapter; and*
- (7) Identification and coordination of appropriate resources to address the performance needs of mentees.*

J. *A mentor in the comprehensive induction program may not participate in the formal evaluation of a mentee.*

[.07] .06 Evaluation of the Comprehensive Induction Program.

A. Local school systems shall evaluate the effectiveness of the comprehensive induction program [and shall use the Maryland Teacher Professional Development Evaluation Guide, October 2008, as a resource for developing an evaluation model].

B. Each local school system induction program shall develop a comprehensive evaluation plan that includes:

- (1) Mentee and mentor perception data of their overall induction experience;
- (2) Mentee experience data regarding their work with their mentor;
- (3) Mentor experience data regarding their work with their mentee;
- (4) Evidence of program components aligned to the:
 - (a) Five Core Propositions of the National Board for Professional Teaching Standards, which are:
 - (i) Teachers are committed to students and their learning;
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 - (v) Teachers are members of learning communities; and
 - (b) Model Code of Educator Ethics; and
 - (c) InTASC Model Core Teaching Standards and Learning Progressions for Teachers 1.0;
- (5) Teacher growth data from the beginning to the end of the induction program as measured by the local school system teacher evaluation system;
- (6) Induction program participants' retention data; and
- (7) Evidence of the number of instructional-driven mentoring minutes every month.

[.08] .07 [Date of] Compliance and Reporting.

A. Local school systems shall be in full compliance with this chapter by July 1, [2011] 2027.

B. Local school systems shall provide a report to the Department by July 1, 2027 that includes:

- (1) A description of the comprehensive induction program demonstrating compliance with this chapter; and
- (2) An evaluation plan that meets the requirements under Regulation .07 of this chapter.

C. Local school systems shall provide a report to the Department beginning July 1, 2029, and every three years thereafter, that includes:

- (1) Mentee and mentor data, including:
 - (a) Mentee growth from the beginning to the end of the induction program;
 - (b) Teacher retention;
 - (c) The number of mentees participating in the comprehensive induction program; and
 - (d) The number of mentors assigned to teachers in the comprehensive induction program;
 - (e) The number of teachers who did not receive the minimum number of mentoring minutes per marking period under Regulation .05F of this chapter with an explanation of the reasons; and
- (2) The results of the evaluation of the comprehensive induction program developed under Regulation .06 of this chapter.

[.09 Reporting Requirements.

A. Local school systems shall include their comprehensive induction program report in their Bridge to Excellence Master Plan Annual Update to the Maryland State Department of Education.

B. This report shall include:

- (1) A description of the mentoring program;
- (2) Data, including the number of probationary teachers and the number of mentors who have been assigned; and
- (3) How they have measured the effectiveness of the program.]

CAREY M. WRIGHT, Ed.D.
State Superintendent of Schools

Date Received	Person Providing Comment	Organization	Reg Citation	Comment	Reg Language	MSDE Recommendation
4/28/2025	Heather Husk	Individual - SMCPs	13A.07.01.03(4) Definitions	The term "veteran teacher" is defined as holding a professional license, new to a system, and with three or more years of teaching experience. This definition does not address a distinction between a conditionally licensed and advanced professional license, or newly hired teachers with years of experience in a private school, which does not require licensure for teachers.	13A.07.01.03(4) reads: "Veteran teacher means a professionally licensed teacher who is new to the local school system and has three or more years of teaching experience."	No change recommended. The definition as written distinguishes between a conditionally licensed teacher with three or more years of experience and a professionally licensed teacher with 3 or more years of experience. A conditionally licensed teacher with more than 3 years may not be defined as a veteran teacher. As written, private teaching experience will count toward total years.
4/28/2025	Heather Husk	Individual - SMCPs	13A.07.01.05(F) Mentoring Component of the Comprehensive Induction Program	To the extent practicable given staffing and fiscal concerns, each new teacher shall receive at least 180 minutes of mentoring per month. Not all months are equal in length and staff duty days. This provides an undue burden on the time of mentors and new teachers with inconsistent expectations. To use the SMPCS SY 2024-2025 calendar as an example, August 2024 included 13 duty days, September 2024 included 19 duty days, October 2024 included 24 duty days, November 2024 included 17 duty days, and December 2024 included 15 duty days. It appears that the intention is to provide approximately 45 minutes of mentoring support to a new teacher each month, and the basic math of four weeks (20 days) in a month would include the expected 180 minutes. However, while the phrasing does include "to the extent practicable," the implication of 180 minutes a month would have indicated to mentors an attempt to include inconsistent support times. To further illustrate from my example based on the duty days each month, consider that August 2024 would have expected 75 minutes a week of support, September 2024 with 47 minutes a week, October 2024 with 37.5 minutes a week, November 2024 with 52.9 minutes a week, and December 2024 with 60 minutes a week. I would recommend further clarification on the weekly expectations within a month.	13A.07.01.05F reads: "To the extent practicable given staffing and fiscal concerns, each new teacher shall receive at least 180 minutes of mentoring per month."	Substantive change recommended. While MSDE does not support eliminating a minimum number of mentoring minutes in the regulations, moving to a quarterly model will provide the flexibility for LEAs to provide customized mentoring based on the teachers' needs at that moment. Example- this will allow the LEA to front-load mentoring at the beginning of the school year, as well as the flexibility to provide less mentoring during months that are heavy with vacation, such as spring break. <i>To the extent practicable given staffing and fiscal concerns, each new teacher shall receive at least 400 minutes of mentoring per marking period.</i>
4/28/2025	Heather Husk	Individual - SMCPs	13A.07.01.05(G) Mentoring Component of the Comprehensive Induction Program	A demonstration of their instruction expertise through a performance task, submission of instructional data, or both; . . . The mentor selection process would become a challenge for systems. The preparation of a performance task can be burdensome for the time and effort of a potential mentor and may result in a reduced pool of applicants for the role. Mentors are selected by administrative teams with knowledge of mentor applicant strengths through observation and evaluation data. This guideline could be addressed through the recommendation of an evaluating school leader who can access instructional data, including SLOs and evaluations, rather than requiring a performance task for mentor applications. While this requirement may be relevant to mentor full-time positions, this expectation is a burden to systems that rely on classroom teachers to mentor new teachers as an extra pay for an extra duty position.	13A.07.01.05G reads: " Each local school system shall have a rigorous selection process for mentors that includes: (1) A demonstration of their instructional expertise through a performance task, submission of instructional data, or both;(2) Assurance that the mentor holds: (a) A Professional or Advanced Professional License; and (b) At least an effective, or comparable, rating on the most recent local school system evaluation; (3) A recommendation from a school or district leader who previously or currently supervises the individual; and (4) Once the Career Ladder is well established, prioritization of those teachers with a designation of Lead, Distinguished, or Professor Distinguished Teacher."	Substantive change recommended. <i>Each local school system shall have a rigorous selection process for mentors that includes: (1) Assurance that the mentor holds: (a) A Professional or Advanced Professional License; and (b) At least an effective, or comparable, rating on the most recent local school system evaluation; (2) A recommendation from a school or district leader who previously or currently supervises the individual and can attest to their readiness for the mentor role; and (3) Once the Career Ladder is well established, prioritization of those teachers with a designation of Lead, Distinguished, or Professor Distinguished Teacher.</i>
4/28/2025	Heather Husk	Individual - SMCPs	13A.07.01.07(C,1,e) Compliance and Reporting	The number of teachers who did not receive at least 180 minutes of mentoring time per month under Regulation .05F of this chapter with an explanation of the reasons; . . . This reporting and compliance expectation is related to the previous concern regarding the inconsistency of duty days within each month. If the reporting of less than 180 minutes each month is directly connected to the number of duty days and opportunities for mentors to engage with new teachers, the reporting data will not have any benefit or provide any insight into the quality of the mentoring. The reporting for some months may include the entire cohort simply because of the limited number of duty days in a given month. If the intention of the data collection associated with reporting and compliance is essential to gather at the state for the evaluation of the induction programs, I would recommend that the data be collected at more consistent intervals and benchmarks, such as marking periods, semesters, or full-year goals and expectations.	13A.07.01.07C(1)(e) reads: " Local school systems shall provide a report to the Department beginning July 1, 2029, and every three years thereafter, that includes: (e) The number of teachers who did not receive at least 180 minutes of mentoring per month under Regulation .05F of this chapter with an explanation of the reasons."	Substantive change recommended. While MSDE does not support eliminating a minimum number of mentoring minutes in the regulations, moving to a quarterly model will provide the flexibility for LEAs to provide customized mentoring based on the teachers' needs at that moment. Example- this will allow the LEA to front-load mentoring at the beginning of the school year, as well as the flexibility to provide less mentoring during months that are heavy with vacation, such as spring break. To the extent practicable given staffing and fiscal concerns, each new teacher shall receive at least 400 minutes of mentoring per marking period.
5/1/2025	Jeffery Maher	Individual - SMCPs	13A.07.01.05(F) and 13A.07.01.07(C,1,e) Mentoring Component of the Comprehensive Induction Program and Compliance and Reporting	This can be a challenge in reporting and documenting - for the main reason that a "month" is not a constant in terms of teacher work days or student days. For example, December only had 17 school days for us this year, whereas October had 24... Spring break complicates March and April, and August and June are often partial months... Recommended considering changing to 45 minutes per "full work week" and a documentation of an average of 45 minutes per week? Or per quarter, since each quarter is 45 days? - or changing the measure to reflect 400 minutes per quarter? Otherwise - we are creating a documenting and reporting nightmare to document and also a bit of a "gotcha" when one is below the 180 in multiple months of the year.	13A.07.01.05F reads: "To the extent practicable given staffing and fiscal concerns, each new teacher shall receive at least 180 minutes of mentoring per month. 13.A.07.01.07C(1)(e) reads: "Local school systems shall provide a report to the Department beginning July 1, 2029, and every three years thereafter, that includes: (e) The number of teachers who did not receive at least 180 minutes of mentoring per month under Regulation .05F of this chapter with an explanation of the reasons."	Substantive change recommended. While MSDE does not support eliminating a minimum number of mentoring minutes in the regulations, moving to a quarterly model will provide the flexibility for LEAs to provide customized mentoring based on the teachers' needs at that moment. Example- this will allow the LEA to front-load mentoring at the beginning of the school year, as well as the flexibility to provide less mentoring during months that are heavy with vacation, such as spring break. To the extent practicable given staffing and fiscal concerns, each new teacher shall receive at least 400 minutes of mentoring per marking period.
5/1/2025	Jeffery Maher	Individual - SMCPs	13A.07.01.05(G) Mentoring Component of the Comprehensive Induction Program	Consider how this is reviewed, esp. as the pool of mentors is lower as the number of new teachers and non-tenured teachers is growing to a greater proportion of school staffs in many areas; and those who would typically mentor are declining this option as they are dedicating their time to pursuing NBC (often a multi-year commitment). Consider that in the selection process - a teachers's effectiveness is already rated based on student learning (e.g., SLOs) - therefore if you have a requirement that they are exemplar teachers, this is already part of that evaluation process. Recommend considering the review of mentor applicants may include a discussion of recently achieved SLOs	13A.07.01.05G reads: "Each local school system shall have a rigorous selection process for mentors that includes: (1) A demonstration of their instructional expertise through a performance task, submission of instructional data, or both; (2) Assurance that the mentor holds: (a) A Professional or Advanced Professional License; and (b) At least an effective, or comparable, rating on the most recent local school system evaluation; (3) A recommendation from a school or district leader who previously or currently supervises the individual; and (4) Once the Career Ladder is well established, prioritization of those teachers with a designation of Lead, Distinguished, or Professor Distinguished Teacher.	Substantive change recommended. <i>Each local school system shall have a rigorous selection process for mentors that includes: (1) Assurance that the mentor holds: (a) A Professional or Advanced Professional License; and (b) At least an effective, or comparable, rating on the most recent local school system evaluation; (2) A recommendation from a school or district leader who previously or currently supervises the individual and can attest to their readiness for the mentor role; and (3) Once the Career Ladder is well established, prioritization of those teachers with a designation of Lead, Distinguished, or Professor Distinguished Teacher.</i>
5/1/2025	Jeffery Maher	Individual - SMCPs	13A.07.01.02 Incorporation by Reference	Has someone done a crosswalk of these? Is there a priority list of the standards that MUST be addressed in the induction program? Consider the time allocated for professional learning for new teachers - and the compensation they would need beyond their teaching day - to participate in these multiple PD opportunities... Recommend deleting the multiple aligned areas as this would create too many areas of focus and therefore ineffective professional learning	13A.07.01.02 reads: " Incorporation by Reference. In this chapter, the following documents are incorporated by reference: A. [Maryland Teacher Professional Development Standards] Standards for Professional Learning (Learning Forward, 2022); B. [Maryland Teacher Professional Development Planning Guide (updated November 2008)] InTASC Model Core Teaching Standards and Learning Progressions for Teachers 1.0 (Council of Chief State School Officers, 2013); C. [Maryland Teacher Professional Development Evaluation Guide, October 2008.] Social Justice Standards: The Teaching Tolerance Anti-Bias Framework (Southern Poverty Law Center, 2018); D. International Society for Technology in Education Standards for Educators (International Society for Technology in Education, 2024); E. Model Code of Ethics for Educators (National Association of State Directors of Teacher Education and Certification, 2023)."	No change recommended. MSDE will provide a crosswalk as part of the technical assistance offered to LEAs in preparation for implementation.

5/1/2025	Dr. Andrae Townsel	Public School Superintendents' Association of Maryland (PSSAM)	13A.07.01.05(F) Mentoring Component of the Comprehensive Induction Program	<p>The updated regulations require a minimum of 180 minutes of mentoring per month for every new teacher during their first 3 years and every conditional teacher (up to 5 years). The three-year mentoring requirement for new teachers means that districts must provide at least 5,400 minutes (90 hours) of individualized mentoring per teacher over the induction period. While mentorship is critical to teacher success, not every new teacher requires the same amount of mentoring, and local school systems should have the flexibility to tailor support based on individual needs rather than being required to provide a uniform level of individualized mentoring. The necessary amount of time is an unmanageable demand for full-time mentors in districts with many new hires.</p> <p>Recommendation for consideration to ensure successful implementation of the regulation while maintaining practicality for districts, we recommend the following: Granting local school systems discretion in determining the appropriate amount of mentoring per teacher, rather than requiring a rigid 180-minute-per-month requirement.</p>	13A.07.01.05F reads: "To the extent practicable given staffing and fiscal concerns, each new teacher shall receive at least 180 minutes of mentoring per month."	<p>Substantive change recommended.</p> <p>While MSDE does not support eliminating a minimum number of mentoring minutes in the regulations, moving to a quarterly model will provide the flexibility for LEAs to provide customized mentoring based on the teachers' needs at that moment. Example- this will allow the LEA to front-load mentoring at the beginning of the school year, as well as the flexibility to provide less mentoring during months that are heavy with vacation, such as spring break.</p> <p>To the extent practicable given staffing and fiscal concerns, each new teacher shall receive at least 400 minutes of mentoring per marking period.</p>
5/1/2025	Dr. Andrae Townsel	Public School Superintendents' Association of Maryland (PSSAM)	13A.07.01.04 Programmatic Requirements	<p>The new requirements, including standardized professional learning topics, structured mentoring activities, and mandated evaluation components, limiting local school systems' ability to design induction programs that align with their specific needs. While alignment with national standards is valuable, a one-size-fits-all model does not account for district-specific challenges, such as variations in available personnel and school size, differences in the experience level of new hires, and the unique challenges faced by rural and urban districts. Local flexibility is essential to ensuring that induction programs are meaningful, effective, and sustainable.</p> <p>Recommendation for consideration to ensure successful implementation of the regulation while maintaining practicality for districts, we recommend the following: Revising the three-year mandate to differentiate mentoring based on teacher performance and need rather than a fixed timeline.</p>	<p>13A.07.01.04 reads: Programmatic Requirements: A. Each local school system shall establish and maintain a comprehensive induction program for all new teachers that is at least three years in duration. B. Each local school system shall establish and maintain a comprehensive induction program for all veteran teachers that is at least one year in duration. C. Each comprehensive induction program shall be designed with a coherent structure and consistent focus to ensure an integrated, seamless system of support for participating teachers and provide them with the knowledge and skills necessary to be successful in their classrooms and schools and prepare them to stay in the profession. D. A comprehensive induction program may be developed and implemented in collaboration with an institution of higher education. E. Each comprehensive induction program shall include: (1) An initial orientation; (2) Ongoing participation in an educator professional learning community; (3) A plan for professional licensure, if applicable; (4) Specialized professional learning on the knowledge and skills new educators need that is aligned with the Maryland-recognized professional learning standards incorporated by reference in Regulation .02 of this chapter; (5) Professional learning on State and local school system initiatives and priorities, including the teacher evaluation system, career ladder for educators, and the College and Career Readiness Standards; (6) Professional learning and support for working with students with disabilities, multilingual learners, and differentiating instruction; (7) Professional learning for using technology in education aligned with the International Society for Technology in Education Standards for Educators incorporated by reference in Regulation .02 of this chapter (8) Review and assessment of the principles of the Model Code of Ethics for Educators incorporated by reference in Regulation .02 of this chapter; (9) Job-embedded individualized and differentiated mentoring; (10) Regularly scheduled opportunities for new teachers to observe and co-teach with skilled teachers, including follow-up discussions of the experiences; (11) Assistance for new teachers with planning instruction; (12) Observations of instruction with feedback; (13) Ongoing professional learning on the multi-tiered system of supports (MTSS) framework to support all students; and (14) A schedule aligned to the Career Ladder for Educators established in Md. Code Education §6-1003. F. Each local school system may identify a program coordinator who will plan and facilitate induction activities by: (1) Communicating with principals and other school leaders about induction activities; (2) Building and maintaining partnerships with local institutions of higher education to ensure a seamless transition from graduation to induction; and (3) Overseeing the evaluation of the comprehensive induction program. G. The comprehensive induction program shall include ongoing professional learning for school leaders. Professional learning may address the following: (1) Retention strategies; (2) Creating the climate and systems for induction; (3) Working with mentors and new</p>	<p>Substantive changes recommended.</p> <p>The regulations, as drafted, provide the minimum expectations for professional learning and alignment to national standards. LEAs are encouraged to customize induction programs to meet the needs of their district priorities. The topics included for professional learning, such as using a multi-tiered system of supports, assistance with planning, and working with students with special education needs and multilingual learners, are critical for all teachers, regardless of where in Maryland they are working. Professional learning may be delivered in a variety of models, including job-embedded training and support. Professional learning should not be limited to stand-alone classroom-based sessions.</p> <p>The three-year induction requirement for new teachers is not new. MSDE does not recommend lessening the current regulatory requirement. It aligns with tenure law and was unanimously recommended by the state workgroup.</p> <p>MSDE does recommend allowing LEAs to provide a gradual release of the mentoring component of induction if the new teacher demonstrates proficiency by achieving an effective year-end evaluation, if the LEA and new teacher are in mutual agreement that it is appropriate to reduce the number of mentoring minutes per marking period.</p>
5/2/2025	Dr. Andrae Townsel	Public School Superintendents' Association of Maryland (PSSAM)	13A.07.01.07 Compliance and Reporting	<p>The mandated level of detailed data collection and triennial reporting places an unreasonable administrative burden on school systems. Reporting on mentees' growth, mentor assignments, and induction effectiveness may require new data tracking systems, requiring additional funding and staff capacity. Compliance should focus on ensuring quality mentorship and teacher support rather than excessive data collection, which diverts time and resources from meaningful program implementation.</p> <p>Recommendation for consideration to ensure successful implementation of the regulation while maintaining practicality for districts, we recommend the following: Reducing or phasing in reporting requirements to lessen the administrative burden while ensuring accountability.</p>	13A.07.01.07 reads: " Compliance and Reporting. A. Local school systems shall be in full compliance with this chapter by July 1, 2027. B. Local school systems shall provide a report to the Department by July 1, 2027 that includes: (1) A description of the comprehensive induction program demonstrating compliance with this chapter; and (2) An evaluation plan that meets the requirements under Regulation .07 of this chapter. C. Local school systems shall provide a report to the Department beginning July 1, 2029, and every three years thereafter, that includes: (1) Mentee and mentor data, including: (a) Mentee growth from the beginning to the end of the induction program; (b) Teacher retention; (c) The number of mentees participating in the comprehensive induction program; and (d) The number of mentors assigned to teachers in the comprehensive induction program; (e) The number of teachers who did not receive at least 180 minutes of mentoring per month under Regulation .05F of this chapter with an explanation of the reasons; and (2) The results of the evaluation of the comprehensive induction program developed under Regulation .07 of this chapter."	<p>No substantive changes recommended.</p> <p>Data collection and reporting are needed to inform the LEA, as well as MSDE, of needed changes to the programs. Without evaluation data, including the growth of the mentee during induction, LEAs will not have the necessary information to modify the induction program as appropriate.</p>
5/6/2025	Chanda Bloom	Individual - BCPS	13A.07.01 (Whole Comprehensive Teacher Induction Program)	<p>This message is in support of the amendment for the state Comprehensive Teacher Induction Program. I have worked as an instructional coach for Baltimore County Public Schools for 7 years, and in that role, I have seen the significant need that our school systems have to support new teachers. This need is both to build efficacy as well as navigate the emotional needs and stress that causes so many to leave the profession early. Additionally, during my tenure as an instructional coach there has been a large shift in the level of experience that new teachers are coming with. Many school systems have faced teacher shortages, leaving the demand for licensed teachers being higher than the availability. This has resulted in large numbers of conditionally licensed teachers. While these teachers often have the best intentions in positively impacting children, they do not have the content knowledge and pedagogy to demonstrate effective instruction. Their needs for professional development are higher and they require a streamlined and intensive approach to maximize positive student outcomes. I believe that a more comprehensive and robust teacher induction program including intensive work with trained master teachers is essential. The proposed amendments to increase programmatic requirements and mentoring requirements as well as a rigorous process for selecting mentors will help to address the needs of all new teachers and promote higher teacher retention rates.</p>	All of 13A.07.01.00	n/a

5/19/2025	Rachel McGain and Dr. Randy Rumpf	State Superintendent's Fine Arts Education Advisory Panel	13A.07.01.05(G) Mentoring Component of the Comprehensive Induction Program	<p>In the five state-designated arts disciplines of dance, media arts, music, visual arts, and theatre, teachers are highly specialized in their content area and make up only 4% of Maryland's overall teacher workforce. As such, there is a small pool of qualified mentors to support new arts teachers in their particular discipline. Licensure area-aligned mentors are critical supports for new and conditionally licensed teachers, and the draft regulations seem to limit the pool of prospective mentors to educators currently employed in the same LEA. Many classroom teachers who are currently serving as mentors are being stretched too thin trying to serve more mentees than they have capacity for. We recommend that the regulations maintain allowances for creative and innovative mentorship models, for example, leveraging the expertise and capacity of retired teachers or creating regional or statewide pools of mentors for highly specialized areas such as the arts. This recommendation is supported by our letter to Dr. Wright on May 5, 2025, which calls for the prioritization of licensure area-aligned mentorship through the induction program including structures that creatively expand the pool of high quality mentors for unique arts disciplines (ex: retired arts teachers, arts teachers outside of the LEA). This proposed strategy is informed by successful experiences of both the members of the panel and district arts supervisors from around the state. An additional consideration related to the specialization of arts teachers is the reliance on school-based evaluations to determine mentor qualifications. High-quality arts instruction can look very different from instruction in other content areas, and many administrators have not received formal training in the arts. This can lead to well-intentioned but inaccurate evaluations—such as misinterpreting an intentional, student-centered classroom management structure as a lack of control. To ensure the mentor pool for arts educators remains robust and reflective of content expertise, we recommend that approval or screening by an arts-trained administrator be included in the mentor selection process. This could serve as an alternative to the standard evaluation requirement in cases where it may not fully capture instructional effectiveness in the arts. Finally, there are systemic barriers for arts teachers to pursue Lead, Distinguished, and Professor Distinguished Teacher licenses. For example, there is no explicit National Board Certification option for dance, theatre, or media arts. This leaves teachers in those arts disciplines limited options of pursuing NBCT through the CTE "Information Systems and Technology, Communications, and the Arts" track or pursuing a higher education degree. Graduate degree options in these disciplines are limited and may be cost-prohibitive. .05 Mentoring Component of the Comprehensive</p>	<p>13A.07.01.05G reads: "Each local school system shall have a rigorous selection process for mentors that includes: (1) A demonstration of their instructional expertise through a performance task, submission of instructional data, or both; (2) Assurance that the mentor holds: (a) A Professional or Advanced Professional License; and (b) At least an effective, or comparable, rating on the most recent local school system evaluation; (3) A recommendation from a school or district leader who previously or currently supervises the individual; and (4) Once the Career Ladder is well established, prioritization of those teachers with a designation of Lead, Distinguished, or Professor Distinguished Teacher."</p>	<p>No substantive changes recommended.</p> <p>The regulations, as drafted, do not preclude an LEA from using retired teachers as mentors. Those teachers will have to maintain their educator credential and otherwise meet the eligibility requirements to serve in that role. Although the regulation states that when the career ladder is well established, prioritization will be given to Lead and Distinguished teachers, the opportunity to utilize retired teachers remains.</p> <p>If employing a retired teacher to mentor in the induction program, that person must have received an effective or comparable rating on the last evaluation they received before retiring.</p>
5/19/2025	Rachel McGain and Dr. Randy Rumpf	State Superintendent's Fine Arts Education Advisory Panel	13A.07.01.05(H) Mentoring Component of the Comprehensive Induction Program	<p>(H) Each local school system shall establish a process for matching mentors and mentees that: 1) Correlates licensure areas or grade bands, with prioritization of licensure areas for specialized subjects such as the arts</p>	<p>13A.07.01.05H reads: " Each local school system shall establish a process for matching mentors and mentees that: (1) Correlates licensure areas or grade bands; and (2) Considers diversity markers to the extent practicable.</p>	<p>Changes recommended.</p> <p><i>Each local school system shall establish a process for matching mentors and mentees that: (1) Correlates licensure areas or grade bands, with prioritization of licensure area; and (2) Considers diversity markers to the extent practicable.</i></p>



April 28, 2025

Dr. Joshua Michael, President
Maryland State Board of Education

Dr. Carey M. Wright, State Superintendent
Maryland State Department of Education

Sent via electronic mail only

Dear Dr. Michael and Dr. Wright,

On behalf of the Public School Superintendents' Association of Maryland (PSSAM), we appreciate the opportunity to review and provide feedback on the proposed amendments to COMAR 13A.07.01 regarding the Comprehensive Teacher Induction Program. While we recognize and support the intent to enhance teacher induction, mentoring, and retention, we would like to highlight several challenges associated with the updated language and its potential impact on local school systems.

The updated regulations require a minimum of 180 minutes of mentoring per month for every new teacher during their first 3 years and every conditional teacher (up to 5 years). The three-year mentoring requirement for new teachers means that districts must provide at least 5,400 minutes (90 hours) of individualized mentoring per teacher over the induction period. While mentorship is critical to teacher success, not every new teacher requires the same amount of mentoring, and local school systems should have the flexibility to tailor support based on individual needs rather than being required to provide a uniform level of individualized mentoring. The necessary amount of time is an unmanageable demand for full-time mentors in districts with many new hires.

Lack of Flexibility for Local Implementation

The new requirements, including standardized professional learning topics, structured mentoring activities, and mandated evaluation components, limiting local school systems' ability to design induction programs that align with their specific needs. While alignment with national standards is valuable, a one-size-fits-all model does not account for district-specific challenges, such as variations in available personnel and school size, differences in the experience level of new hires,

and the unique challenges faced by rural and urban districts. Local flexibility is essential to ensuring that induction programs are meaningful, effective, and sustainable.

Concerns with Compliance and Reporting Requirements

The mandated level of detailed data collection and triennial reporting places an unreasonable administrative burden on school systems. Reporting on mentees' growth, mentor assignments, and induction effectiveness may require new data tracking systems, requiring additional funding and staff capacity. Compliance should focus on ensuring quality mentorship and teacher support rather than excessive data collection, which diverts time and resources from meaningful program implementation.

Recommendations for Consideration

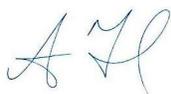
To ensure successful implementation of the regulation while maintaining practicality for districts, we recommend the following:

- Granting local school systems discretion in determining the appropriate amount of mentoring per teacher, rather than requiring a rigid 180-minute-per-month requirement.
- Revising the three-year mandate to differentiate mentoring based on teacher performance and need rather than a fixed timeline.
- Reducing or phasing in reporting requirements to lessen the administrative burden while ensuring accountability.

We appreciate the Board's commitment to strengthening teacher induction and mentorship. However, we urge you to consider these challenges and allow for local flexibility in implementation to ensure that the policy remains practical, sustainable, and beneficial to new educators and school systems statewide.

We welcome the opportunity to discuss these concerns further and collaborate on solutions that uphold the intent of the revised regulations while ensuring feasibility at the district level. Please contact our Executive Director at marypat.fannon@pssam.org if you have any questions or would like to discuss these concerns in more detail.

Sincerely,



Dr. Andraé Townsel, President

Cc: Members of the Maryland State Board of Education, via Zachary Hands, Executive Director
Alex Reese, Chief of Staff
Dr. Tennette Smith, Deputy State Superintendent, Office of Teaching and Learning
Dr. Elise Brown, Assistant State Superintendent of Instructional Programs and Services
Kelly Meadows, Assistant State Superintendent, Division of Educator Effectiveness



Kristin Alkire -MSDE- <kristin.alkire@maryland.gov>

13A.07.01 Comprehensive Teacher Induction Program

2 messages

Bloom, Chanda W. <cbloom@bcps.org>
To: "kristin.alkire@maryland.gov" <kristin.alkire@maryland.gov>

Tue, May 6, 2025 at 2:10 PM

Hello Mrs. Alkire,

This message is in support of the amendment for the state Comprehensive Teacher Induction Program. I have worked as an instructional coach for Baltimore County Public Schools for 7 years, and in that role, I have seen the significant need that our school systems have to support new teachers. This need is both to build efficacy as well as navigate the emotional needs and stress that causes so many to leave the profession early.

Additionally, during my tenure as an instructional coach there has been a large shift in the level of experience that new teachers are coming with. Many school systems have faced teacher shortages, leaving the demand for licensed teachers being higher than the availability. This has resulted in large numbers of conditionally licensed teachers. While these teachers often have the best intentions in positively impacting children, they do not have the content knowledge and pedagogy to demonstrate effective instruction. Their needs for professional development are higher and they require a streamlined and intensive approach to maximize positive student outcomes. I believe that a more comprehensive and robust teacher induction program including intensive work with trained master teachers is essential. The proposed amendments to increase programmatic requirements and mentoring requirements as well as a rigorous process for selecting mentors will help to address the needs of all new teachers and promote higher teacher retention rates.

Thank you,

Chanda Bloom

Consulting Teacher

Patapsco High School (Home School)

Baltimore County Public Schools



Empowering Teachers to Promote Student Success

Kristin Alkire -MSDE- <kristin.alkire@maryland.gov>
To: "Bloom, Chanda W." <cbloom@bcps.org>

Tue, May 6, 2025 at 2:22 PM

Good afternoon,

Received...Thank you!

In partnership,

Kristin



Kristin Alkire

Coordinator of Educator Effectiveness
Division of Educator Effectiveness

O: (410) 767-0751

kristin.alkire@maryland.gov

200 W. Baltimore Street

Baltimore, Maryland 21201

marylandpublicschools.org



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Kristin Alkire -MSDE- <kristin.alkire@maryland.gov>

Public Comment for (COMAR) 13A.07.01 Comprehensive Teacher Induction Program

2 messages

Heather Husk <hlhusk@smcps.org>
To: kristin.alkire@maryland.gov

Mon, Apr 28, 2025 at 10:53 AM

Good morning,

Thank you for the opportunity to provide feedback on the proposed draft amendments to the Code of Maryland Regulations (COMAR) 13A.07.01 Comprehensive Teacher Induction Program. I have noted my comments in a bulleted list with the corresponding section at the start of each comment.

- *13A.07.01.03 Definitions. (4) - The term "veteran teacher" is defined as holding a professional license, new to a system, and with three or more years of teaching experience.* This definition does not address a distinction between a conditionally licensed and advanced professional license, or newly hired teachers with years of experience in a private school, which does not require licensure for teachers.
- *13A.07.01.05 (F) - To the extent practicable given staffing and fiscal concerns, each new teacher shall receive at least 180 minutes of mentoring per month.* Not all months are equal in length and staff duty days. This provides an undue burden on the time of mentors and new teachers with inconsistent expectations. To use the SMPCS SY 2024-2025 calendar as an example, August 2024 included 13 duty days, September 2024 included 19 duty days, October 2024 included 24 duty days, November 2024 included 17 duty days, and December 2024 included 15 duty days. It appears that the intention is to provide approximately 45 minutes of mentoring support to a new teacher each month, and the basic math of four weeks (20 days) in a month would include the expected 180 minutes. However, while the phrasing does include "to the extent practicable," the implication of 180 minutes a month would have indicated to mentors an attempt to include inconsistent support times. To further illustrate from my example based on the duty days each month, consider that August 2024 would have expected 75 minutes a week of support, September 2024 with 47 minutes a week, October 2024 with 37.5 minutes a week, November 2024 with 52.9 minutes a week, and December 2024 with 60 minutes a week. I would recommend further clarification on the weekly expectations within a month.
- *13A.07.01.05 (G,1) - A demonstration of their instruction expertise through a performance task, submission of instructional data, or both; . . .* The mentor selection process would become a challenge for systems. The preparation of a performance task can be burdensome for the time and effort of a potential mentor and may result in a reduced pool of applicants for the role. Mentors are selected by administrative teams with knowledge of mentor applicant strengths through observation and evaluation data. This guideline could be addressed through the recommendation of an evaluating school leader who can access instructional data, including SLOs and evaluations, rather than requiring a performance task for mentor applications. While this requirement may be relevant to mentor full-time positions, this expectation is a burden to systems that rely on classroom teachers to mentor new teachers as an extra pay for an extra duty position.
- *13A.07.01.07 (C,1,e) - The number of teachers who did not receive at least 180 minutes of mentoring time per month under Regulation .05F of this chapter with an explanation of the reasons; . . .* This reporting and compliance expectation is related to the previous concern regarding the inconsistency of duty days within each month. If the reporting of less than 180 minutes each month is directly connected to the number of duty days and opportunities for mentors to engage with new teachers, the reporting data will not have any benefit or provide any insight into the quality of the mentoring. The reporting for some months may include the entire cohort simply because of the limited number of duty days in a given month. If the intention of the data collection associated with reporting and compliance is essential to gather at the state for the evaluation of the induction programs, I would recommend that the data be collected at more consistent intervals and benchmarks, such as marking periods, semesters, or full-year goals and expectations.

--

Dr. Heather Husk
Instructional Resource Teacher, Induction and Mentoring
Department of Strategic Initiatives
[Internal SMPCS Induction Site Link](#)

Phone - 301-475-5511 Ex. 32102

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Kristin Alkire -MSDE- <kristin.alkire@maryland.gov>
To: Heather Husk <hlhusk@smcps.org>

Mon, Apr 28, 2025 at 11:23 AM

Good morning,

Received and thank you!

In partnership,

Kristin



Kristin Alkire
Coordinator of Educator Effectiveness
Division of Educator Effectiveness

O: (410) 767-0751
kristin.alkire@maryland.gov

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Baltimore, Maryland 21201
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Kristin Alkire -MSDE- <kristin.alkire@maryland.gov>

Public Comment for COMAR 13A.07.01 - Induction

2 messages

Jeffrey Maher <jamaher@smcps.org>
To: kristin.alkire@maryland.gov

Thu, May 1, 2025 at 9:58 AM

Please see the feedback below

180 minutes a month...

- 13.A.07.01.05 (F) - To the extent practicable given staffing and fiscal concerns, each new teacher shall receive at least 180 minutes of mentoring per month.
- **Compliance and Reporting:**
13.A.07.01.07 (C,1,e) - The number of teachers who did not receive at least 180 minutes of mentoring time per month under Regulation .05F of this chapter with an explanation of the reasons...
 - *This can be a challenge in reporting and documenting - for the main reason that a "month" is not a constant in terms of teacher work days or student days. For example, December only had 17 school days for us this year, whereas October had 24... Spring break complicates March and April, and August and June are often partial months...*
 - *Recommended considering changing to 45 minutes per "full work week" and a documentation of an average of 45 minutes per week? Or per quarter, since each quarter is 45 days? - or changing the measure to reflect 400 minutes per quarter?*
 - *Otherwise - we are creating a documenting and reporting nightmare to document and also a bit of a "gotcha" when one is below the 180 in multiple months of the year.*

Mentor Selection

- 13.A.07.01.05 (G,1) - A demonstration of their instruction expertise through a performance task, submission of instructional data, or both
 - *Consider how this is reviewed, esp. as the pool of mentors is lower as the number of new teachers and non-tenured teachers is growing to a greater proportion of school staffs in many areas; and those who would typically mentor are declining this option as they are dedicating their time to pursuing NBC (often a multi-year commitment). Consider that in the selection process - a teachers's effectiveness is already rated based on student learning (e.g., SLOs) - therefore if you have a requirement that they are exemplar teachers, this is already part of that evaluation process.*
 - *Recommend considering the review of mentor applicants may include a discussion of recently achieved SLOs*

Standards Alignment

- Alignment to Standards for Professional Learning, InTASC, Social Justice Standards, ISTE, Model Code of Ethics, and NBCT...
 - *Has someone done a crosswalk of these? Is there a priority list of the standards that MUST be addressed in the induction program?*
 - *Consider the time allocated for professional learning for new teachers - and the compensation they would need beyond their teaching day - to participate in these multiple PD opportunities...*
 - *Recommend deleting the multiple aligned areas as this would create too many areas of focus and therefore ineffective professional learning*

JM

Jeffrey A. Maher, Ph.D.
Chief Strategic Officer
St. Mary's County Public Schools
301.475.5511 ext. 32133

There are no secrets to success. It is the result of preparation, hard work, and learning from failure.
- General Colin Powell

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Kristin Alkire -MSDE- <kristin.alkire@maryland.gov>
To: Jeffrey Maher <jamaher@smcps.org>

Thu, May 1, 2025 at 10:37 AM

Good morning,

Your public comment has been received...

In partnership,

Kristin



Kristin Alkire

Coordinator of Educator Effectiveness
Division of Educator Effectiveness

O: (410) 767-0751

kristin.alkire@maryland.gov

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Kristin Alkire -MSDE- <kristin.alkire@maryland.gov>

Public Comment on 13A.07.01 Comprehensive Teacher Induction Program

3 messages

Rachel McGrain <rmcgrain@aems-edu.org>

Mon, May 19, 2025 at 1:04 PM

To: kristin.alkire@maryland.gov

Cc: randy.j.rumpf@mcpsmd.net

Dear Kristin,

My name is Rachel McGrain and I co-chair the State Superintendent's Fine Arts Education Advisory Panel along with Dr. Randy Rumpf (cc-ed). We write to you with public comment regarding 13A.07.01 Comprehensive Teacher Induction Program. We are happy to follow up with further detail and connect you with educators and administrators who can speak more in depth to some of these concerns and proposed changes.

In the five state-designated arts disciplines of dance, media arts, music, visual art, and theatre, teachers are highly specialized in their content area and make up [only 4%](#) of Maryland's overall [teacher workforce](#). As such, there is a small pool of qualified mentors to support new arts teachers in their particular discipline. Licensure area-aligned mentors are critical supports for new and conditionally licensed teachers, and the draft regulations seem to limit the pool of prospective mentors to educators currently employed in the same LEA. Many classroom teachers who are currently serving as mentors are being stretched too thin trying to serve more mentees than they have capacity for. We recommend that the regulations maintain allowances for creative and innovative mentorship models, for example, leveraging the expertise and capacity of retired teachers or creating regional or statewide pools of mentors for highly specialized areas such as the arts.

This recommendation is supported by our letter to Dr. Wright on May 5, 2025, which calls for the prioritization of licensure area-aligned mentorship through the induction program including structures that creatively expand the pool of high quality mentors for unique arts disciplines (ex: retired arts teachers, arts teachers outside of the LEA). This proposed strategy is informed by successful experiences of both the members of the panel and district arts supervisors from around the state.

An additional consideration related to the specialization of arts teachers is the reliance on school-based evaluations to determine mentor qualifications. High-quality arts instruction can look very different from instruction in other content areas, and many administrators have not received formal training in the arts. This can lead to well-intentioned but inaccurate evaluations—such as misinterpreting an intentional, student-centered classroom management structure as a lack of control. To ensure the mentor pool for arts educators remains robust and reflective of content expertise, we recommend that approval or screening by an arts-trained administrator be included in the mentor selection process. This could serve as an alternative to the standard evaluation requirement in cases where it may not fully capture instructional effectiveness in the arts.

Finally, there are systemic barriers for arts teachers to pursue Lead, Distinguished, and Professor Distinguished Teacher licenses. For example, there is no explicit National Board Certification option for dance, theatre, or media arts. This leaves teachers in those arts disciplines limited options of pursuing NBCT through the CTE "Information Systems and Technology, Communications, and the Arts" track or pursuing a higher education degree. Graduate degree options in these disciplines are limited and may be cost-prohibitive.

To address all of the aforementioned concerns and considerations, we recommend the following updates (*italicized & bolded*) to the regulation language:

.05 Mentoring Component of the Comprehensive Induction Program

G. Each local school system shall have a rigorous selection process for mentors that includes:

(2) Assurance that the mentor holds:

- (a) A Professional or Advanced Professional License **or be a retiree who has previously held a professional or advanced professional license or equivalent;** and
- (b) At least an effective, or comparable, rating on the most recent local school system evaluation, **have received a comparable rating on a prior evaluation if retired, and/or received approval from a licensure area-aligned administrator;**

(4) Once the Career Ladder is well established, prioritization of those teachers with a designation of Lead, Distinguished, or Professor Distinguished Teacher, **except in licensure areas, such as the arts, where systemic barriers limit access to these designations.**

H. Each local school system shall establish a process for matching mentors and mentees that:

- (1) Correlates licensure areas or grade bands, **with prioritization of licensure areas for specialized subjects such as the arts**

Thank you for your consideration,

Rachel McGrain, co-chair, Maryland’s Fine Arts Education Advisory Panel
 Dr. Randy Rumpf, co-chair, Maryland’s Fine Arts Education Advisory Panel

Note, not to include: 4% of teacher workforce calculation: 2,684 arts teachers out of 63,515 total teachers

Rachel McGrain (she/her)
 Arts Education in Maryland Schools (AEMS) | Executive Director
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Kristin Alkire -MSDE- <kristin.alkire@maryland.gov>
 To: Rachel McGrain <rmcgrain@aems-edu.org>
 Cc: randy.j.rumpf@mcpsmd.net

Mon, May 19, 2025 at 3:17 PM

Received...Thank you very much for the feedback!

In partnership,

Kristin



Kristin Alkire
Coordinator of Educator Effectiveness
Division of Educator Effectiveness

O: (410) 767-0751
kristin.alkire@maryland.gov

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 Baltimore, Maryland 21201
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Rachel McGrain <rmcgrain@aems-edu.org>

Tue, May 20, 2025 at 9:42 AM

6/2/25, 11:19 AM

State of Maryland Mail - Public Comment on 13A.07.01 Comprehensive Teacher Induction Program

To: Kristin Alkire -MSDE- <kristin.alkire@maryland.gov>

Cc: randy.j.rumpf@mcpsmd.net

Great, thank you and you're welcome!

Rachel McGrain (*she/her*)

Arts Education in Maryland Schools (AEMS) | Executive Director

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