



February 18, 2022

Christina Grant
State Superintendent of Education
Office of the State Superintendent of Education
1050 First Street NE
Washington, DC 20002

Dear Superintendent Grant,

The D.C. State Board of Education (SBOE) appreciates the opportunity to provide public comment on the Office of the State Superintendent of Education (OSSE) Notice of Proposed Rulemaking (NPRM) regarding Educator Preparation Provider (EPP) State Approval published in the D.C. Register on January 21, 2022.¹

Pursuant to §38–2652(a)(6), the State Board has the approval authority over standards for accreditation and certification of teacher preparation programs (EPPs) of colleges and universities or teacher preparation academies. During 2021, the State Board appreciated OSSE’s ongoing engagement and partnership related to the consideration and eventual approval of the EPP standards set by the Council for the Accreditation of Educator Preparation (CAEP), as well as inclusion of requirements to explicitly require the District’s future public-school teachers to be prepared in the science of reading.

OSSE’s proposed rulemaking (DCMR Title 5, Chapter 17, “State Approval of Educator Preparation Providers and Subject Area Programs”) is a strong codification of the previous discussions held between the State Board and OSSE. However, the State Board notes a few areas that would benefit from additional clarity and changes. Those areas are summarized below in order of appearance in the proposed rulemaking.

- **Public charter school credentials** – The State Board recognizes OSSE’s understanding of the authority it has over public charter school credentialing, as stated in Section 1700.2. The State Board recommends that OSSE ensure that all public-school teachers in the District’s schools are held to high and rigorous standards.
- **Approval Schedule** – In the interest of continued transparency and collaboration, the State Board asks that OSSE provide the agency with a copy of the “[approval] schedule” as described in Section 1701.6.
- **Needs Assessment** – The State Board affirms the usage of a needs assessment as outlined under Section 1703. The State Board notes the usage of language for an EPP or subject area program “to consider critically whether there is a demonstrated need...before it applies for state approval.” Further, as outlined under Section 1703.2(a), the State Board agrees with the description and evidence, that at minimum, should be provided by an EPP or subject area

¹ <https://dcregs.dc.gov/Common/DCR/Issues/IssueDetailPage.aspx?issueID=965>



program (i.e., examination of enrollment practices to assess whether candidates and completers reflect the racial and ethnic diversity of the student populations of District of Columbia Public Schools (DCPS), ensuring candidates and completers are provided practicum and clinical experience opportunities, and making efforts to provide candidates and completers with racially and ethnically diverse faculty). Additionally, as outlined under Section 1703.2(c), the State Board appreciates OSSE’s language asking EPPs for a description and evidence on how the program “plans to sustain its operations, including actual candidate enrollment at a level that is sufficient to sustain the provider...”

However, the State Board asks that the racial and ethnic diversity of the student populations of *all District public schools* be noted in Section 1703.2(a)(1), not just that of DCPS and that additional clarity be made in Section 1703.2(a)(2) around the specific number of “practicum and clinical experience opportunity” *hours* that shall be completed by candidates.

- **Scientifically-Based Reading Instruction** – Per Section 1704.6 and Section 1706.7, the State Board makes the following comments:
 - There is an inconsistent use of language between the initial state approval language (i.e., Section 1704.6) and the renewal of state approval language (Section 1706.7), such that the former includes: “...shall be required to demonstrate to OSSE that its candidates *are required to* complete coursework that addresses...”, while the latter has omitted the above italicized language. The State Board requests clarity as to its omission and would suggest that the same language be used in both sections.
 - The State Board seeks additional clarity of language and purpose around these two sections, such that the sections only reference subject area programs. The State Board suggests language that would explicitly note EPPs (i.e., “*EPPs* that are preparing candidates with primary responsibility for literacy instruction shall be required to demonstrate...” instead of the list of subject-area program types²). The current regulatory language would suggest to a novice audience that EPPs are not required to ensure that any candidates they are preparing with primary responsibility for literacy instruction demonstrate competency in the components of scientifically-based reading instruction. A novice audience might not understand that all EPPs have subject area programs, and in order for an EPP to be fully approved, so do their subject area programs. The State Board suggests that this clarification also be made in Section 1799 (Definitions).
 - To the State Board’s first comment on public charter school credentials, the State Board knows that our students experience literacy challenges across both the traditional and public charter school sector—and asks that OSSE ensure that all public-school teachers in the District’s schools are held to the same high and rigorous scientifically-based reading instruction standards. Further, this includes all current teachers who may

² Elementary education subject area program, early childhood education subject area program, special education subject area program, and reading subject area program.



already be credentialed and have matriculated through an approved EPP or subject-area program—the State Board urges OSSE to ensure all current teachers have the knowledge of scientifically-based reading instruction practices.

- **Annual Reporting** – The term “annual reporting” as described in Section 1707.4 should be further clarified and defined in the rulemaking; it is unclear if the “annual reporting” required of EPPs or subject area program on probation is the same data collection and reporting stipulated in Section 1709. Further, should “annual reporting” be included in Section 1799, “Definitions”?
- **Waivers** – The State Board cautions OSSE’s usage of broad and general language (e.g., “if OSSE determines...”, “...as determined by OSSE”) when describing provisions of the proposed EPP or subject area program approval and reporting process that could be waived. As described in Section 1714.1, “one of more provisions of sections 1703, 1709, or 1713” may be waived—these sections include the needs assessment, data collection and reporting, and fees, respectively. As shared above, the State Board strongly affirms the needs assessment requirement for EPPs and subject area programs—and recognizes its importance to ensuring and demonstrating racial and ethnic diversity. The needs assessment requirement should not be a permissible item eligible to be waived without extreme need and every effort should be made that all EPPs and subject area programs submit one. Additionally, the State Board expresses reservations related to the waiving of data and reporting requirements; the State Board understands the importance of ongoing and continuous data management and collection policies in the District and believes that any possibly waiving of this requirement would be a disservice to the public.

The State Board understands that OSSE is soliciting public comment on the *Educator Preparation Provider (EPP) State Approval* regulations through Monday, February 21, 2022, and is fully committed to working alongside you and your staff as these regulations are finalized.

Sincerely,

Jessica Sutter, Ward 6 Representative and President
 Eboni-Rose Thompson, Ward 7 Representative and Vice President
 Jacque Patterson, At-Large Representative
 Emily Gasoi, Ward 1 Representative
 Allister Chang, Ward 2 Representative
 Ruth Wattenberg, Ward 3 Representative
 Frazier O’Leary, Ward 4 Representative
 Zachary Parker, Ward 5 Representative
 Carlene Reid, Ward 8 Representative
 Juliana Lopez, Student Representative

