

Public comment received on
proposed amendments to regulations
related to the qualification and
certification of Alaska educators

January 26, 2022

Dear Chair Fields and Members of the State Board of Education and Early Development,

Thank you for your service to the students, families, and educators in our state. As faculty of the School of Education at the University of Alaska Southeast, we are writing to provide testimony on the proposed regulation changes to Title 4 of the Alaska Administrative Code (AAC) dealing with the qualification and certification of Alaska educators under 4 AAC 12.

We were very pleased to see that Initial teaching certificates would be valid for up to five years (4 AAC 12.305(d)), and that a background check done for a student teacher would still be valid if they apply for their Initial teacher certification upon graduation (4 AAC 12.300(l)(1)). Both of these proposed regulation changes will remove barriers for teachers who are new to the profession. The research on the number of teachers who leave the profession within their first three years is quite compelling, and these have the potential to play a part in reversing the current trend.

We are, however, opposed to the inclusion of the master teaching portfolio that is proposed as a pathway to earn a master teaching certificate. Currently, a master teaching certificate is available to teachers who have achieved National Board certification, which is a rigorous process where teachers must provide standards-based evidence related to their content knowledge, ability to analyze and use student data to design instruction, engage effectively with students, and be an effective and reflective practitioner.

Similar to the National Board certification process, the ability of an educator to complete a master's degree from an accredited institution of higher education requires demonstrated evidence of their ability to meet national standards. A master's degree provides the added benefit over National Board certification of new knowledge in a specific content area relevant for education. The important point we want to stress is that both National Board certification and the earning of a master's degree requires that the educator is accountable for demonstrated mastery of standards through rigorous review and transparency measures. Institutions that offer a master's degree in the field of education go through an accreditation process that requires high levels of demonstrated effectiveness during the instruction process, as well as in our graduates' impact in practice.

Alternatively, the proposed inclusion of a 4 AAC 12.305(o)(2) "district-approved professional development plan that includes any combination of microcredentials, workshops, conferences, or participation in ongoing professional networks" has zero accountability or review measures, provides no level of standard to be met, and provides for no transparency in the process. This proposed option to the statewide priority criteria of a master teaching portfolio is in no way equivalent to the accountability standards afforded by earning a master's degree, especially when considering the intensive training and demonstration regarding literacy and reading skills that are part of a master's level program. Consequently, we emphatically state our opposition to the inclusion of element (2) in the list of options

that would comprise a master teaching portfolio addressing statewide priorities, which is also included in 4 AAC 12.305(c)(2)(C).

Our opposition to 4 AAC 12.305(o)(2) extends to the proposed addition of a “district-approved professional development plan that includes any combination of microcredentials, workshops, conferences, or participation in ongoing professional networks” for professional teaching certificate (4 AAC 12.305(b)(6)(C)), as well as a spouse of an active member of the armed forces of the United States seeking initial licensure. Our opposition is due to the same reasons previously stated regarding a lack of accountability associated with such a plan, the lack of any assurance that any level of standard has been met, nor does such a plan provide for any level of transparency in the process.

4 AAC 12.305(o)(C) “a classroom research study while participating in a professional network” has potential to be relevant for a master teaching certificate if required along with the earning of a master’s degree. However, as stated, the language is vague and offers no level or rigor or accountability. If assurances of rigor and accountability toward the required national or state teacher certification standards were addressed in the proposed language, this could be a valuable consideration when an educator who already has a master’s degree goes to renew their master teaching certificate. A few examples of acceptable standards would be the Interstate Teacher Assessment and Support Consortium (InTASC) Standards, the Council for the Accreditation of Educator Preparation (CAEP) Standards, as well as other DEED standards. To clarify, this element should in no way be a substitute for earning a master’s degree in the list of artifacts addressing statewide priorities to be included in a master teaching portfolio for anyone applying for a master teaching certificate, a professional teaching certificate, or for a spouse of an active member of the armed forces of the United States seeking initial licensure.

4 AAC 12.305(b)(6) addresses recency credits that are needed to renew a teaching license. The proposed regulations add a new category of professional learning called microcredentials. Our concern is that there are explicit expectations needed for the (A) college credit and (B) continuing education units, whereas the adequate number of (C) microcredentials needed for recertification simply states “equivalent”. Microcredentials can be offered through a college credit course or through continuing education units or can be offered as a stand-alone professional learning opportunity. We are opposed to microcredentials being a replacement option to college credit or continuing education units. Specifically, our opposition to microcredentials is due to the fact that the proposed regulation does not offer a quantifiable minimum needed for educators using microcredentials for recertification, as it does for the other listed options of college credit and continuing education units. Additionally, districts can easily offer ED 593 courses or continuing education units for targeted learning that is associated with microcredentials, which means microcredentials can already be used to support continuing education that is required for recertification.

When a district offers ED 593 credits for teachers who earn microcredentials, there are inherent accountability standards in that process. The proposed regulation does not identify what counts for a microcredential, and some microcredentials have accountability measures; however, it is possible to offer a microcredential that does not have accountability measures. If it is critical to specifically address microcredentials, then the number needed to qualify as a minimum for recertification must be explicitly stated, as required of the other areas, be truly equivalent to the other required areas, and there must be transparent accountability measures.

Another proposed regulation change we oppose also has to do with microcredentials being used to add endorsements on a teaching certificate eligible for renewal, and the fact that accountability measures

associated with microcredentials are not defined in the proposed regulation. Specifically, 4 AAC 12.396(a)(4)(D) “a microcredential as approved by the department, based on a completed application form submitted to the department by a district or an educational organization” is offered as an alternative to (A) “a doctorate degree”, (B) “a master's degree”, or (C) “a baccalaureate degree, with a major or posted minor of at least 18 semester hours in an approved program in the content or specialty area for which an endorsement is sought”. There is no equivalent of “a microcredential” to a doctoral degree, master’s degree, or 18 semester hours in a baccalaureate degree, and we want to stress that the proposed regulation only requires “a microcredential”.

Our concern over the lack of definition and accountability measures regarding microcredentials extends to the proposed change in 4 AAC 12.405(a) where an unidentified number of microcredentials could be used for recertification instead of a defined number of credits. As noted previously, microcredentials can be included in ED 593 credits, which would add an accountability measure to their use. Our opposition to including microcredentials is not around the value of microcredentials to continuing professional learning opportunities for educators but rather around the consistent lack of specificity regarding how microcredentials will be used in teacher certification in the proposed regulation changes for which there is zero transparency.

The proposed regulation changes for 4 AAC 12.396(a)(2) adds elementary education to a list that already includes middle school, high school, and world languages. The regulation applies to certificate holders being able to add an endorsement in the areas included in the list noted above if the teacher has two years of teaching in the content area and they pass the endorsement-related content area examination. At first glance this may seem to make sense, as elementary education was not initially included in the list of options; however, upon closer examination the addition of elementary education to the list is problematic.

Considering our current statewide focus on reading proficiency at the third grade level, it is universally known that it takes specialized training to teach at the critical early years in a student’s school career, and these early years are foundational to success in life. Elementary education is not like middle school or high school where teachers teach in their area of specialty. Elementary teachers must be proficient in all content areas and have specific training in regards to teaching reading and math. Without a solid foundation in the early grades in these critical areas, students will not be able to build on their skills throughout the subsequent years. Consequently, the existing regulation is correct and we oppose the addition of elementary education to the list of areas where current certificate holders can test out and document experience to add the endorsement. We stand in support of the value of learning the specific pedagogical approaches that are appropriate for elementary aged students.

Throughout the proposed regulation changes is the addition of national accreditation to the previously established regional accreditation. In most cases this allows for educators with a career and technical focus to become licensed teachers. However, the proposed regulation 4 AAC 12.308(a) includes adding national accreditation to a list of educator preparation areas that are not affiliated with national certification. Specifically, it includes “(1) a teacher preparation program; (2) a special education teacher preparation program; (3) an education administrator preparation program; the program may include a specialization for principal or superintendent; (4) a special education administrator preparation program; (5) a special services preparation program in school psychology, school counseling, school social work, or school library science.” These educator preparation areas only come from regionally accredited institutions, and consequently, we are opposed to the proposed amendment to 4 AAC 12.308 (a) that would add “or nationally” to this specific regulation.

Correction Noted: The published *Notice of Proposed Changes to Teacher Certification in the Regulations of the Department of Education and Early Development* stated that the proposed changes to simplify qualification requirements included removing “the recency credit requirements for the regular administrative (Type B) and special services (Type C) certificates”. In the proposed regulation changes itself, 4 AAC 12.347(b) was proposed to be removed; however, this statute applies specifically to Special Education Administrators (Type F) holders. It appears that the Notice incorrectly identified Type B when it should have read Type F. We do not have any opposition to removing the recency credit requirements for professionals who are required to have recency credits to keep their content certificate valid, as is the case for the professionals who would be eligible for a Type C and subsequently Type F certificates. If this is not a typographical error and the intention is to remove recency credit requirements for holders of Type B certificates, then we would express concern over that, as administrators (Type B) holders are essential in the process of providing a quality education for students and must be held accountable for keeping current in the field through recency credits.

Thank you for the opportunity to provide input on the proposed regulation changes to Title 4 of the Alaska Administrative Code dealing with the qualification and certification of Alaska educators under 4 AAC 12. In summary, our greatest concerns revolve around the consistent lack of specificity associated with the “district-approved professional development plan that includes any combination of microcredentials, workshops, conferences, or participation in ongoing professional networks” (4 AAC 12.305(o)(2), 4 AAC 12.305(c)(2)(C), and 4 AAC 12.305(b)(6)(C)). Additionally, we are gravely concerned about the equal treatment of microcredentials to earning a degree from an accredited institution of higher education, which is clearly **not** equal. We appreciate your attention to our comments.

Respectfully submitted by the following School of Education faculty at the University of Alaska Southeast,

Susan Andrews	Kim Hanisch	Dr. Greg Sampson
Dr. Heather Batchelder	Dr. Elizabeth Hartley	Jerry Schoenberger
Robin Dahlman	Mischa Jackson	Dr. Kevin Spink
Dr. Kitty Deal	Dr. Jeffrey Lofthus	Dr. Mary Wegner
Dr. Virgil Fredenberg	Dr. Lisa Richardson	

Summary of proposed regulation changes included in testimony:

- Initial certification valid for 5 years: 4 AAC 12.305(d)
- Extending time for student teacher background check to be valid: 4 AAC 12.300(l)(1)
- Professional development plan included as option for a master teaching portfolio, professional teaching certificate, and initial licensure for a spouse of active military:
 - 4 AAC 12.305(o)(2)
 - 4 AAC 12.305(c)(2)(C)
 - 4 AAC 12.305(b)(6)(C)
- Classroom research study included as option for a master teaching portfolio, professional teaching certificate, and initial licensure for a spouse of active military: 4 AAC 12.305(o)(C)
- Microcredentials:
 - 4 AAC 12.305(b)(6)
 - 4 AAC 12.396(a)(4)(D)
 - 4 AAC 12.405(a)
- Elementary education added to the list of possible endorsements eligible through experience and passing of a content-specific test: 4 AAC 12.396(a)(2)
- Addition of national certification: 4 AAC 12.308(a)
- Clarification that it is Type F and not Type B regarding recency credits: 4 AAC 12.347(b)

From: [Alaska Online Public Notices](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: New Comment on NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT
Date: Tuesday, January 25, 2022 2:05:28 PM

A new comment has been submitted on the public notice [NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT](#).

Submitted:

1/25/2022 2:05:24 PM

Benjamin D. Olson, Ph.D.
bolson@akbible.edu

Eugene, OR, US
Anonymous User

Comment:

I am glad to see the change to the regulation requiring Educator Preparation programs to have "regional" accreditation. As this is archaic and outdated terminology that is no longer in use in academia. The United States Department of Education eliminated the term "regional" from accreditors in 2020 for several reasons. One of those reasons was that the six "regional" accreditors were no longer operating solely within their own regions. Another more important reason was that there was no discernable difference in the requirements by the US Ed for "regional" and "national" accreditors. This distinction created the false perception that "regional" accreditation was somehow better than "national" accreditation. Having served in and with the administrations of colleges that have or were seeking both at various times, I can attest that the narrative is a false one. In fact, it has been my experience that many times "national" accreditors were more fastidious as they were needlessly attempting to overcome this false sense of inferiority.

Ultimately, this change means that more colleges in the state of Alaska will be able to pursue offering Education degrees that are recognized by the state without the added burden of seeking additional accreditations while maintaining the more important requirement of programmatic accreditation from Educator Preparation accreditors like CAEP.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

Commissioner's Office,
Department of Education and Early Development
Attn: Regulations Review
801 West Tenth Street, Suite 200
PO Box 110500
Juneau, Alaska 99811

January 26th, 2022

Written comment from NEA-Alaska President Tom Klaameyer regarding the proposed changes to teacher certification in the regulations of the Department of Education and Early Development.

NEA-Alaska members are 100% in favor of reducing arbitrary barriers to entry to the education professions and streamlining and eliminating bureaucratic red tape. There are a number of practical and positive proposals contained in these proposed regulation changes. However, Alaska's educators have grave concerns about reductions in the expectations for and quality of our education workforce.

The proposed regulations look reasonable for non-certificated staff, but we have real concerns for changes for certificated education professionals.

We support the proposals to:

- **Expand certification renewal and additional endorsement options to include micro-credentials.** The use of micro-credentials for professional development and/or re-certification is definitely something that will give our members flexibility in meeting credit requirements.
- **Offer increased opportunities for paraprofessionals with two years of experience to qualify for the Instructional Assistant Type I limited certificate that provides a pathway to full teacher certification.**

We have concerns regarding:

- **Allows advanced Type C certificates to be issued to individuals holding a license issued by the Alaska Division of Corporations, Business, and Professional Licensing.** There is a staffing crisis of related service providers in Alaska. This includes school psychologists, speech, language, hearing, physical and occupational therapists. Many school districts are turning to online and out-of-state providers for these vital services. Our most vulnerable students deserve Alaska-based professionals to provide these

critical services in person. These online and out-of-state providers will have no experience with Alaska culture or history and little opportunity to actually get to know our students. Current regulations were written for in-person, in-state expert providers. In-person learning and in-person services, such as physical therapy and speech and language therapy are unquestionably best for kids. Placing our most vulnerable students in front of more screens with adults who are far away is not the direction that we should head in response to the staffing shortage crisis.

- **Allowing individuals holding at least a bachelor's degree to qualify for a special education teacher and special services alternative program certification.** While we recognize that Alaska is experiencing a recruitment and retention crisis of certificated Special Education professionals more acutely than other education professions, simply allowing anyone with a bachelor's degree to earn a special education certification is a dramatic reduction in the requirements to serve as a certificated educator of some of our most vulnerable students with the most complex education needs.
- **Allowing for credits and degrees offered by nationally accredited institutions of higher education to meet certification requirements.** Alaska must be cautious about accepting national accreditations. There are numerous sham accreditations, especially for online programs - some of which have little to no actual student teaching requirements or feedback from a mentor teacher. If moving forward with this, NEA-Alaska recommends that we add some qualifiers to which national accreditations are accepted, such as "approved nationally accredited program." Alaska DEED should closely examine which institutions offer rigorous instruction and standards and which set minimum standards for student contact time in teacher prep programs.

We understand that finding efficiencies in our certification process was identified by the Governor's Teacher Retention and Recruitment Working Group and applaud action following up on the group's recommendations. That said, these regulation changes do little to address the systemic, long-term, and critical educator retention and recruitment crises facing our state and impacting our students.

Alaska's attraction and retention problems are driven to a far greater degree by a lack of competitive compensation and benefit packages, a stable retirement system, sufficient

and sustainable funding for public education, not to mention crippling and excessive Special Education caseloads, and unsustainable and dangerous class sizes - contributing factors which have also been identified by the Governor's Teacher Retention and Recruitment Working Group survey findings.

From: [Alaska Online Public Notices](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: New Comment on NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT
Date: Wednesday, January 26, 2022 4:01:02 PM

A new comment has been submitted on the public notice [NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT](#).

Submitted:

1/26/2022 4:00:59 PM

Jennifer Greene
jmg@alaskan.com

Anchorage, AK, US
Anonymous User

Comment:

I have concerns about educators being able to renew a teaching certificate through only Continuing Education Units. CEUs only require seat time and do not require any assessment or documentation of learning. As someone who has taken many CEUs, a participant doesn't even have to pay attention and can still be awarded the CEU. Competency should not be measured solely by attendance.

Microcredentials are indeed better, as you cannot earn the credential without documentation of learning. However, I do have concerns about how microcredentials will be vetted.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: New Comment on NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT
Date: Wednesday, January 26, 2022 4:09:57 PM

A new comment has been submitted on the public notice [NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT](#).

Submitted:

1/26/2022 4:09:53 PM

Jennifer Harty
jcharty@alaska.edu

Anchorage, AK, US
Anonymous User

Comment:

I think adding microcredentials as part of the recertification route is a good option for educators. However, it is concerning that university credits are being unequally equated with microcredentials and CEUs for renewal. A single university credit requires the equivalent of 15 contact hours plus 30 hours of additional contextual study and/or reflective/sustained application together with required documentation/demonstrations of learning. This demand of 45 hours of learning engagement for one credit translates to 270 hours for six university credits. The proposed regulations are equating this commitment of 270 hours with just 90 equivalent hours of microcredentials and just 90 hours of CEUs. The CEUs are of particular concern because they are only seat-time based and do not require any type of learning documentation/demonstration. Another consideration is, how will a multitude of microcredentials from various sources be vetted for quality and consistency?

Given those concerns and to ensure educators are involved in meaningful, substantive, and sustained professional learning, would it be a possibility to expand the options for renewal while also maintaining the balance of university credits to noncredit options existing in the current regulations? This would add microcredentials as a noncredit category choice along with CEUs.

Thank you for the opportunity to comment on these proposed changes.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: New Comment on NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT
Date: Monday, January 24, 2022 7:08:36 PM

A new comment has been submitted on the public notice [NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT](#).

Submitted:

1/24/2022 7:08:31 PM

Jill Horsman
jahorsman@gmail.com

Wasilla, AK, US
Anonymous User

Comment:

I support 4AAC to adjust state regulations to reflect the updated federal terminology related to educator programs. Thank you for your hard work on this, and other critical, educational programming for excellence in Alaska.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Doug&Mary](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Comments - The proposed amendments would adopt changes regarding the qualification and certification of Alaska educators
Date: Monday, January 10, 2022 12:34:24 PM

[You don't often get email from olson1@mtaonline.net. Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification>.]

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern,

I am a physical therapist who has worked in the Alaska Public School System since 1978. I have held a Type C certificate until I let it lapse 7-8 years ago when I was working with rural districts on a contract basis. I renewed it 5 years ago when I was required to have a Type C certificate because the school district I was working with included the 0-3 early intervention program which required the Type C certificate.

During the course 40 plus years since initially certified I had multiple recertifications. I was often frustrated with the requirement to obtain college credits for recertification. At the same time I am required to take CEUs every two years to maintain my Alaska physical therapy license. When I have attended coursework that helped me develop my professional skills at workshops and conferences I received the CEUs I needed. Every 5 years I looked around for some remotely related coursework that would qualify for my Type C recertification. It was both costly and a misdirected waste of time and energy which made minimal impact on my ability to provide state of the art physical therapy services to children in the public schools.

I was fortunate to work on both a master's and a doctoral degree during during the 40 years which helped alleviate taking unproductive coursework. To repeat, post graduate course work for professional development in the field of physical therapy comes in the form of Continuing Education Units.

I have no problem with requiring/expecting ongoing professional development for people working in public education. Please make the changes necessary that the requirement is not an unnecessary hoop when appropriate requirements are already required to maintain physical therapy licensure in the state of Alaska. The CEUs I acquire to maintain my license improve my professional abilities far more than any course I have sought to meet the "college credits" requirement.

Thank you for considering changing this recertification so that the professionals who work in Alaska public schools can continue to improve themselves professionally without unnecessary and unproductive requirements.

Mary Olson, PT

From: [Alaska Online Public Notices](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: New Comment on NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT
Date: Tuesday, January 25, 2022 4:21:14 PM

A new comment has been submitted on the public notice [NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT](#).

Submitted:

1/25/2022 4:21:09 PM

Noel Maxwell
nmaxwell@akbible.edu

Wasilla, AK, US
Anonymous User

Comment:

In light of the current teacher shortage, I am very supportive of making these changes. We need to do all we can to streamline the pathway for new teachers and aides to support the students of our state.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: New Comment on NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT
Date: Tuesday, January 25, 2022 12:16:40 PM

A new comment has been submitted on the public notice [NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT](#).

Submitted:

1/25/2022 12:16:35 PM

David Ley
dley@akbible.edu

Wasilla, AK, US
Anonymous User

Comment:

Thank you for initiating these changes. This will facilitate the process of addressing our teacher shortages with well trained and qualified teachers from accredited institutions throughout our country. It also will allow institutions that have gone through the rigors of national accreditation to have credibility with local institutions who have denied access and transfer of credits due to a regional accreditation stipulation. In essence, it will also allow traditionally termed regional accreditation associations the opportunity to impact the quality of education outside the limits of their region. I think it is a win win for all and hope that these changes will be approved.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

TO: Commissioner's Office

FROM: Annette Island School District
RJ Elementary
Fort Lewis Cohort
Paras to Teachers Program

RE: Written response to proposed changes to Teacher Certification

RJ Elementary serves 200 children on the last Native Alaska Reservation in Metlakatla, Alaska. Our school is part of Annette Island School District and in recent years has experienced a high turnover of certified teachers. This turnover has impacted our children and we are on a path to address this impact. Changes to teacher certification are welcomed and needed for our children and their future.

Annette Island School District has a strong paraprofessional team that partners with the teachers to provide support and success to our children. Currently RJ Elementary employs 24 paraprofessionals and 18 certified teachers. The paraprofessionals are and have been members of the community and provide strong relationships with children.

It is the dream of the paraprofessionals to obtain their teaching degrees. As a result, we reached out to Fort Lewis University and began a cohort of learners in August of 2021. It is our goal to complete our degrees by Fall of 2024.

Many of the proposed regulation changes will impact our dream of serving the children of Metlakatla and allow it to happen, We are in support of a number of these proposals to expand certification pathways and qualifications.

It would be an honor to speak with you and share directly the impact. Your questions would also be welcome.

We would also like to extend an invitation for you to visit our school. It would be an honor for our children to meet you and for all of us to share our learning.

Thank you for being supportive in our journey to be teachers for our children!

AISD Cohort
Mary Donaldson Facilitator
Annette Island School District
920-495-8521
mdonaldson@aisdk12.org

FROM OUR LEARNERS

Kristen Martin
PO Box 130
Metlakatla, Ak. 99926
kmartin@aisdk12.org
907-821-8059

I am currently in my 5th year as a paraprofessional with the Annette Island School District. Currently I am working in the 3rd grade and the lead teacher and I have our room set up to co-teach in smaller groups. In our smaller groups we have the higher kids in their own group and the lower kids in another group with goals of moving up. I am also set up to teach the whole class if for some reason the lead teacher is unable to come to class/school.

By allowing paraprofessionals with at least two years' experience to qualify for the Instructional Assistant Type I limited certificate would not only help us continue our education to becoming educators but I believe it will help with retention of paraprofessionals. The retention also helps with building strong relationships with students and giving the kids a great community while in school.

My dream is to become an elementary teacher here in my hometown. I would like to be here for the kids of the future and be able to give back to my community. I want to be able to teach the kids about our culture and help be "the good" in their lives.

Thank you!

Mariah Raber
PO BOX 776
Metlakatla, Alaska 99926
mraber@aisdk12.org
907-204-1371

This is my second year as a paraprofessional with Annette Island School District. I am working with the 3rd grade class as a one-to-one and I also assist the lead teacher majority of the time. We have it set up to where I run a group for centers and math, I can also run the classroom if my lead teacher is ever gone.

My dream is to become an elementary teacher in my hometown. By allowing paraprofessionals with at least two years' experience to qualify for the Instructional Assistant Type I limited certification that will provide a pathway to a full teaching credential would help us continue our education as a paraprofessional to becoming an educator.

Kalen Edenshaw
P.O. Box 526
Metlakatla ALaska 99926
9076176569
kedenshaw@aisdk12.org

This is my first year working with the special education department as a one on one paraprofessional in the pre-k through 2nd special education room. Its my third year working at Richard Johnson Elementary school. Although I am assigned to one student I help around the classroom where needed.

My Dream is to become a preschool teacher. I would like to have a classroom designed and dedicated to the 3 year old children of Metlakatla. It would be amazing to offer early education to young children that are the ages of 3-4. Its my dream for young children to have access to education well before they turn 5.

Selma McCarty
P.O Box 334
Metlakatla, Alaska 99926
smccarty@aisdk12.org
907-617-79987

This is my first year working with Annette Island School District as a paraprofessional teacher. I work in two rooms, one room in the morning and then another in the afternoon. I work in the Special Education room in the mornings (8:00am-12:00pm) and then I switch into my mom's room, which is the Pre-k room in the afternoon (12:00pm-3:30pm). We've never had the lead teacher absent in the special education room before, but when my mom is absent then her para is the lead teacher and i am her para's para.

My dream is to be an elementary teacher, preferably 2nd grade or below. I would like to be a teacher anywhere but Metlakatla, I do not want to live here my whole life. But if my plans don't go as I planned, I will probably come back home and teach here in Metlakatla.

Sandra Sanchez Torres
PO Box 227
Metlakatla, Alaska
sandratorres15@zoho.com
907.821.1668

My story begins on Annette Island, in Metlakatla. I have chosen to live and raise my family of 8. I also have 13 grandchildren. I have worked with children and families in different capacities such as Daycare, Head Start, Children's Mental Health.

For the past nine years I have been working in the fish industry. One of our island's natural resources. I have made the decision to work on obtaining my teaching degree and remain here in Metlakatla even when our youngest two children are grown. As a youth, I was very fortunate to have incredible teachers that made an impact on my life and why I long to be a teacher. Majority of my early elementary teachers were with my Aunt or my Uncle.

I have just started out my own educational journey and I am a part of a partnership program with the Annette Island School District and Fort Lewis College. One semester under my belt. I am currently transitioning from my current position to obtaining employment within our school district as a Paraprofessional. Changes in the regulations, having at least 2 years of experience in the classroom will help Paraprofessionals to continue their educational journey to become educators within our district. This impact will be very beneficial for the students in our community as this will alleviate the high turnover rate of teachers each year.

From: [Alaska Online Public Notices](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: New Comment on NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT
Date: Thursday, January 13, 2022 4:07:34 PM

A new comment has been submitted on the public notice [NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT](#).

Submitted:

1/13/2022 4:07:30 PM

Peggy Rankin
rankin_peggy@asdk12.org

Anchorage, AK, US
Anonymous User

Comment:

I would like to thank everyone for your work surrounding these proposed changes.

In addition to the following: Awards at no cost qualified military spouses who qualify for their first Alaska certificate and teachers who qualify for a Master certificate;

I would like to see law enforcement spouses added to this.

Thank you for your consideration

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: New Comment on NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT
Date: Tuesday, January 25, 2022 8:14:31 AM

A new comment has been submitted on the public notice [NOTICE OF PROPOSED CHANGES TO TEACHER CERTIFICATION IN THE REGULATIONS OF THE DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT](#).

Submitted:

1/25/2022 8:14:27 AM

Steve Brown

Fairbanks, AK, US
Anonymous User

Comment:

I strongly support this change!! Thank you all for drafting it.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)