



February 1, 2022

The purpose of this update is to provide feedback to educational partners on NCACTE's collective perceptions of the current policy discussions related to revising the teacher licensure process in North Carolina. These [proposals](#) were originally suggested by the Human Capital Roundtable and have been reviewed over the last year by [PEPSC subcommittees](#). This document was created by the [NCACTE Advocacy & Policy Committee](#), almost all of whom serve on one of the subcommittees.

After spending many months in meetings, reviewing documents, and listening to feedback from all stakeholders involved, we have synthesized our thoughts here. While we believe this work has progressed, there are still several areas where we believe additional work is needed. We would like to thank PEPSC for this work and continue to offer our service as these issues evolve. **We ask for the reader's indulgence in reviewing this entire document carefully.**

In our discussions, three priorities emerged (in no particular order):

#### **A. The most appropriate use of microcredentials**

The use of microcredentials is being considered as one possible option for licensing new teachers. After hearing several presentations to the subcommittees on microcredentials, **we firmly believe that microcredentials are not an appropriate substitute for an approved, rigorous, and holistic EPP program for licensing beginning teachers.** This is not an attempt on NCACTE's part to undermine the idea of microcredentials; on the contrary, if used appropriately, we believe that microcredentials could offer a pathway to an add-on license or advancement on the upper levels of the proposed licensure system. We do advocate that microcredentials be developed for advancement and possibly "add-on" licensure options.

**A group of microcredentials is not the same as a cohesive, rigorous program of study, especially for someone seeking a first-time teaching license.** All EPPs in NC have to be approved and it is unclear if a "microcredentials only" option becomes a *de facto* EPP. This could create accountability and equity issues. We already have 60+ EPP programs in our state, many of them offering online options, reduced costs, and maximum flexibility. Many university-based EPP programs are already accredited by either CAEP or AAQEP, thereby ensuring a level of quality and rigor. We currently are experiencing the "churn" of teachers leaving classrooms in NC, which is exacerbating the problem of having insufficient numbers of experienced, trained teachers serving children. We truly believe that no longer requiring EPP completion and/or allowing microcredentials to stand in lieu of EPP completion is not "flexibility," but rather a significant reduction in our standards for teacher preparation that will result in greater numbers of underprepared teachers leading classrooms.

It is also worth noting that nationally, completing a high-quality EPP is considered a basic requirement of licensure. Nearly every other state requires the completion of a state-approved licensure program, regardless of licensure status in another state. This means that teachers licensed via an alternative route, such as those proposed for License 1 and License 2 via microcredentials, may not have the ability to be licensed in many other states. This change would significantly reduce teacher preparation standards in North Carolina for candidates entering the profession (or at least for achieving a clear, renewable license) when compared to the rest of the country. Some have touted the microcredential option for initially licensing teachers as a positive development, as NC would be the first state to do this. We believe there is a reason that other states have considered and rejected this option.

## **B. Removing unnecessary testing and barriers for EPP entry and licensure completion**

We have consistently heard from P-12 partners and EPP colleagues that standardized exams (for both entry and licensure) are a barrier to many teacher candidates in the current climate. In previous years, when the teacher pipeline was robust, we could have these test requirements and still fill vacancies. Unfortunately, that robust pipeline does not exist today. At this time, we agree with many stakeholders that entry and licensure exams serve as barriers to placing more teachers, particularly more diverse teachers, in classrooms.

There is a [growing research base](#) establishing entrance exams like PRAXIS Core as a significant obstacle to teacher recruitment and diversity in the teacher pipeline. **We support removing PRAXIS Core as a requirement to enrolling in an EPP preparation program**, as currently mandated in [GS 115C-269.15](#) & SBE Policy [TCED-009](#).

In addition, **we support removing the licensure exam requirement currently mandated by the SBE policy [LICN-003](#) for educators who have completed an EPP program**. NC has had such policies in the past; in the late 2000s, middle and secondary teacher candidates could EITHER pass the licensure exam or have three years of consistent positive principal evaluations, with the principal's recommendation for full licensure at the end of Year 3. If the SBE and legislature believe there is value in passing this licensure exam, this exam could be reframed as an incentive for new teachers in terms of additional compensation on the starting salary scale or for those who pass the exam by adding it as an option for becoming a Highly Qualified teacher (see [SL 2021-180](#), section 7A.2).

- A note about edTPA/PPAT: edTPA and PPAT are currently considered by DPI and SBE to be "licensure exams." However, we note that edTPA/PPAT are comprehensive, portfolio-based assessments created over the course of several

weeks or months. They are not like a standardized test/licensure exam. A better frame of reference is a comparison of edTPA to National Boards, as edTPA was designed by the same team who created National Boards for teachers. By policy, removing all requirements for licensure exams would remove the requirement for edTPA/PPAT. However, many EPPs would probably opt to keep edTPA/PPAT completion (not necessarily passing) as a program requirement (not a licensure requirement), as the edTPA/PPAT provide valid and reliable data on candidate performance, as well as providing the state data on candidate comparisons for program evaluation (e.g., edTPA/PPAT is currently part of the proposed state EPP accountability model). **Using it in this way, edTPA/PPAT would NOT serve as a barrier to licensure but WOULD allow EPPs to still make effective use of the tool at their discretion.** It could also continue to provide the state with data on EPPs, as well as continuing to serve as another incentive for teachers in earning additional compensation (high edTPA/PPAT scores already serve as evidence of a Highly Qualified teacher in NC per [SL 2021-180](#), section 7A.2). Policymakers should consider edTPA/PPAT separately from other kinds of licensure exams in these discussions.

### C. Allowing EPP completion to serve as the only requirement for initial teacher licensure

Instead of creating a more complicated and overly complex set of options for initial teacher licensure, we support simplifying the process by amplifying those preparation pathways known to produce the most competent and impactful teachers--NC's approved EPPs. While this could be viewed as an opportunity to "feather our nest," we see this as an opportunity to allow NC's own rich evidence-base of teacher data to lead our policy making efforts. For example:

- EPP completers have:
  - i. 60+ credits in their content area for traditional programs
  - ii. Extensive clinical experiences, including pre-internship/student teaching
  - iii. 600+ hour internship including observations / feedback on performance
  - iv. Recommendation for licensure by clinical educator mentor, principal, and university supervisor
- EPP completers stay longer in the profession in NC ([EPIC Report on Retention](#)).
- EPP completers are more successful than other preparation pathways ([EPIC Report on Portals and Effectiveness](#)).
- [EPP completer data for 2018-19](#) shows IHE graduates are highly successful in teaching reading and math in our state and that their principals also rate IHE program candidates highly.
- EPP completers in Elementary Education have Science of Reading principles embedded in their curriculum.

By allowing NC's approved EPPs to address testing and performance metrics internally and situating initial licensure cleanly with EPP completion, NC establishes a clear yet rigorous pathway for future teachers to navigate and for the districts who will welcome them to their ranks.

To better understand our proposals, we created the chart on the next page. Our intent was to replicate the same frame of reference as presented on the original HCRT proposal. Our focus is on the initial licensure areas (Apprentice, License 1, License 2, License 3) versus the advanced licensure areas:

(Continued on the next page)



**North Carolina Association for Colleges of Teacher Educators**  
*Move Forward. Work Together. Make a Difference.*

**Table 1: NCACTE Proposed North Carolina Licensure Model Revision**

	Apprentice License	License 1	License 2	License 3	License 4 Continuing License	License 5+ Continuing License
Entry Requirement	Associates degree	Bachelor's degree (including 24 relevant credit hours OR pass the approved content exam(s) OR completing approved content-related microcredentials.  Exam(s) is <u>an option</u> to meet the content standard, not a requirement.	Requirements:  Bachelor's degree  Affiliation with EPP*	Requirements**:  Bachelor's degree  Successful completion of EPP*  **Could consider requiring that candidates <u>take</u> edTPA / PPAT as evidence of teaching practice; candidates who meet minimal scoring requirements on edTPA/PPAT would possibly earn additional compensation (i.e., higher edTPA scores = better salary).	Requirements:  Bachelor's degree  Successful completion of EPP*  Score highly qualified teaching status through a combination of options. Possibilities: –edTPA/PPAT –3 years of successful principal recs –Microcredentialing –Passing scores on optional licensure exams –3 years of positive EVAAS outcomes –Others	Requirements:  License 4 + stack of microcredentials + student outcomes  Other options: –Coaching credentials –Leadership credentials –specific microcredentials related to these fields –service in leadership roles (successful experience counts on license)
Role	NOT teacher of record	Teacher of record but with <u>full-time</u> mentor or coach	Teacher of record with <u>full-time</u> mentor or coach	Teacher of record		Teacher of record with additional responsibilities TBD by district
Time limit on License	4 years	1 year	3 years	None	None	None

\*We recommend strengthening the EPP approval process to include national accreditation (CAEP or AAQEP). Alternatively, the state could design a more rigorous EPP approval process than is currently in place.

**We believe this model has several benefits:**

- It streamlines our current processes by removing barriers that have been identified by many stakeholders;
- It supports EPP completion, which research shows is the most effective way to prepare teachers in NC;
- It incorporates the use of microcredentials as a supportive path to teacher advancement and/or add-on licensure without sacrificing candidate quality or program cohesion;
- It incentivizes accountability measures like licensure exams, making them “carrots” instead of “sticks;”
- It could simplify licensure at the DPI to eliminating the current patchwork of multiple types of initial licensure (e.g. Permit to Teach, Emergency Licenses, Residency 1, 2, 3, Limited licenses). If the current system is confusing and hard to navigate, what we propose here helps with that immensely.

**We ask that PEPSC and other stakeholders officially consider our proposal as outlined in this document.** We realize that there may be deadlines for this work that we are unaware of, but we ask for your indulgence in this matter.

In closing, we would like to offer one final point: there has been much discussion in the subcommittee meetings on “outputs.” This concept was originally shared in the [HCRT proposal](#) and has been a key point throughout this process. The subcommittee working norms were framed around this idea of offering ideas that most impact students directly in the classroom. We wholeheartedly support developing processes that can have the greatest positive impact on the most students. We also support the idea of gathering data and using evidence to make decisions about what works and what doesn't.

However, within this context, there must be an acknowledgement that inputs do matter. **If we don't consider quality and rigor on the front end, then students will have to endure poorly prepared teachers while we collect outcome data, and then determine that different inputs are needed (which could conceivably take years).** Historically marginalized students in NC already have [less access to well-credentialed and effective teachers](#). These students do not have the luxury of time in their educational careers to await outputs from questionably prepared teachers. The proposal in its current form could inadvertently exacerbate this gap.

**The biggest concerns consistently raised by stakeholders on licensing teachers are related to testing barriers; we find no evidence that P-12 stakeholders lack faith in EPP program completion as a way to prepare teachers.** Creating a menu of options isn't necessarily a better thing; why not provide the latitude to remove what EPPs and P-12 know is not working and keep what is? It seems that investing resources to help candidates successfully complete a rigorous EPP program (i.e., free tuition and fees, scholarships, NC Teaching Fellows expansion, etc.) would be a beneficial use of funds in multiple ways for our state for all approved EPPs, not just those at colleges and universities.

We appreciate thoughtful consideration of this proposal by all stakeholders as we move forward in this work. Thank you.

NCACTE Advisory and Policy Committee, on behalf of the NCACTE Executive Board and Membership

Chris Godwin, Campbell University, NCACTE President  
Laura Hart, independent member, Advisory and Policy Committee Chair  
Patricia Bricker, Western Carolina University  
Vivian Covington, East Carolina University  
Jackie Ennis, Barton College  
Patricia Fecher, Methodist University  
Loury Floyd, UNC Pembroke, NCACTE Past-President  
Erin Horne, NC State University  
Diana Lys, UNC Chapel Hill  
Hannah Reeder, Appalachian State University  
Jennifer Russell, Peace University  
Brad Smith, UNC Charlotte