

SSTESOL of Florida's Response to Call for Public Comments on

Proposed Priorities, Requirements, Definition, and Selection of Criteria-Education Innovation and Research- Teacher-Directed Professional Learning Experiences

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Overall: Reducing regulatory burden as a result

PROPOSED PRIORITIES

Proposed Priority 1: Teacher-Directed Professional Learning

Responses that are *In Agreement* with PP1:

Sunshine State TESOL of Florida believes that:

- A key to student achievement is quality teaching brought about by deep engagement in differentiated and personalized professional learning.
- Professional learning that will increase teachers' knowledge of content in their fields of instruction is crucial to teachers' success in delivering instruction that is aligned to assessment.
- Teachers' meaningful efforts and attention to professional learning are key in order for professional development to be successful and cause positive impact on classroom practices.
- A teacher professional learning plan designed to improve content knowledge and classroom practices could be a great way to support improvement of classroom practices in order to improve student achievement, especially high-needs students, including English Learners.

SSTESOL believes that the proposed priority could be achieved through a Teacher's Professional Learning Plan, tied to enhancement of teaching practices and enrichment of content knowledge in order to improve student's academic achievement and English language proficiency and which is funded through teacher stipends. Professional learning activities should address teaching skills and/or content knowledge that are directly related to student needs, especially as it relates to minoritized populations (i.e., English learners, students with disabilities, students on F/R lunch, students of color). This plan must be discussed with the teacher's supervisor and mutually agreed upon by both entities at the beginning of the school year, reviewed and evaluated throughout the year based on the unfolding needs that teachers and students have. For this initiative to be successful, it must be considered a school district policy and an agreement with the teacher's bargaining unit.

SSTESOL agrees in providing a teacher's stipend for professional learning activities for each content area, including attendance to local, state, and national conferences that could count for up to half of mandatory state required training for recertification of teaching certificates.

In the case of required mandatory training as provided by Court orders or Consent Decrees, SSTESOL believes that the USDOE and the SEA must honor and fund the terms of those agreements.

Lastly, the signatories appreciate the inclusion of research that correlates with Proposed Priority 1.

Proposed Priority 2: State Educational Agency Partnership

Responses that are *Not In Agreement* with PP2:

Sunshine State TESOL of Florida does not agree with:

- A pre-approved selection of professional learning by the State Education Agency (SEA) as a means to provide a wide selection of professional learning providers and experiences for teachers of English learners. This strategy could only work if 1) a rubric set by the USDOE could provide guidance to each SEA in the selection of professional learning providers, and 2) an Advisory Board on the state level composed of experts in each field, such as English learners, could serve as consultants in effective professional learning, activities and in choosing professional development providers.
- Partnership with SEA is necessary for funding of stipends and establishment of micro-credentialing programs.
- The absence of research to support PP2 is problematic.

Proposed Priority 3: Local Education Agency Partnership

Responses that are *In Agreement* with PP3:

Sunshine State TESOL of Florida believes that:

- Teachers are employees of an LEA, a partnership with an LEA is necessary in managing the stipend program.
- Because the stipends project is a teacher-focused and oriented activity, teachers should have the flexibility to choose the activities and providers that meet their individual professional development plans.

Responses that are *Not In Agreement* with PP3:

- SSTESOL does not agree with an LEA entering into a contract with a professional learning provider without the collaboration and agreement of teacher professional learning communities, grade level chairpersons, and bargaining units in the LEA.

PROPOSED APPLICATION REQUIREMENTS:

Responses that are *In Agreement* with Proposed Application Requirements:

Overall, the SSTESOL of Florida agrees with the proposed requirements except for (d)2

Sunshine State TESOL of Florida believes that:

(d)2 Pre-approved options of professional learning are contrary to your concept of providing autonomy for teachers to choose from different options in the field of professional development that will personalize their learning with the goal of improving classroom practices. SSTESOL recommends that teachers choose whatever they need to implement their Professional Learning Plan.

DEFINITION

SSTESOL proposes that English Learners be added after the phrase “high-need students.” The modified first sentence of the last paragraph will be:

Professional learning must be job-embedded or classroom-focused and related to the achievement and attainment of high-needs students and English Learners.

PROPOSED SELECTION CRITERIA

Responses that are *In Agreement* with Proposed Selection Criteria:

SSTESOL of Florida believes that:

- (a) and (b) USDOE should fully fund USDOE initiatives that are meant to achieve relevant, high-quality, and are aligned to standards, instruction and assessment.
- SSTESOL applauds USDOE’s plan for providing funds to allow teachers the flexibility and autonomy in crafting their professional learning that will be listed in their professional learning plan.
- The application and payment process and structure must not cause any burden to teachers, especially in high-needs schools and teachers in low-income areas.

ANSWERS TO QUESTIONS

- Are the requirements in the proposed regulations clearly stated? Yes
- Do the proposed regulations contain technical terms or other wording that interfered with the clarity? Yes. Add the definition of professional development in the Definitions section. Who/what qualifies as entities for partnership in PP2 and PP3?
- Does the format of the proposed regulations (grouping and other sections, use of headings, paragraphing, etc.) aid or reduce their clarity? Reduce
- Would the proposed regulations be easier to understand if we divided them into more (but shorter) sections? Yes, but don’t lose important details.

- What else could we do to make the proposed regulations easier to understand?
Provide an example of partnership in PP2 and PP3.