MEMORANDUM

TO: Members and Staff of the MN Professional Educator Licensing and Standards Board
FROM: Danyika Leonard, Policy Director, on behalf of Education Evolving
DATE: January 28, 2020
RE: Public Comment on Proposed Draft 1 of Revised Rules Under R4615,
    Relating to Standards of Effective Practice for Teachers

This memo provides a detailed review of and recommendations for the first draft of Minnesota’s revised Standards of Effective Practice (SEPs), as proposed by the Professional Educators Licensing and Standards Board (PELSB) in September 2019.

In June 2019, Education Evolving (EE) published a recommendation memorandum\(^1\) identifying nine areas that PELSB could strengthen or add in drafting the new SEPs. Each recommendation included examples of model language from other states, to ultimately serve as a guide in revising the standards.

Following the release of the first draft of the SEPs in September, Education Evolving:

- Solicited feedback from 125 teachers and other stakeholders, through emails, event activities, and most recently a number of in-depth one-on-one interviews; and
- Completed a comparative analysis between the proposed standards and our previous recommendation memo, and conducted new research and analysis to inform the recommendations that follow.

A Great Step in the Right Direction

Overall Commendations. We would like to offer a number of general commendations for this first draft, including on:

- The overall structure, the efforts to reduce the number of standards, and the use of concise and concrete language to focus on what matters most.
- The sharpened focus on educational equity, including the importance of supporting positive identity development, advancing literacy and second language acquisition, recognizing dehumanizing biases, practicing cultural humility, and critical self-reflection.
- The removal of the “diverse learners” section, which was situated from a dominant culture-normed perspective and “otherized” students from the full diversity of racial and ethnic groups in Minnesota, students with learning differences, English language learners, and others.
- The alignment of the standards with modern teaching science and academic research. Namely, we were pleased to see the incorporation 18 of 19 high-leverage practices from Teaching Works,\(^2\) as well as a large number of InTASC Model Core Teaching Standards.\(^3\)

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1. [https://www.educationevolving.org/content/recommendations-for-minnesotas-teacher-standards-of-effective-practice](https://www.educationevolving.org/content/recommendations-for-minnesotas-teacher-standards-of-effective-practice)
2. [http://www.teachingworks.org/work-of-teaching/high-leverage-practices](http://www.teachingworks.org/work-of-teaching/high-leverage-practices)
3. [https://ccsso.org/sites/default/files/2017-12/2013_INTASC_Learning_Progressions_for_Teachers.pdf](https://ccsso.org/sites/default/files/2017-12/2013_INTASC_Learning_Progressions_for_Teachers.pdf)
The addition of language and emphasis around involving students and community in learning, adapting learning to meet each learner’s unique assets and needs, and teachers demonstrating competencies rather than just knowledge (namely, the vast majority of the standards in the draft begin with the phrase “be able to” not just “understand”).

Summary of Educator Feedback Received. We appreciate PELSB’s efforts to reflect educator feedback. In our work to engage education professionals (teachers, administrators, teacher preparation faculty and staff), thought-leaders, advocates, and community members a number of common themes came through. We consistently heard: positive reactions to the draft’s additional equity language, strong affirmations for more of an equity focus overall, appreciation for more language around social and emotional learning, and more standards on collaboration with families.

Summary of Alignment With Earlier Recommendations. Our comparative analysis found that PELSB made commendable strides in many of the recommendation areas in our June 2019 memo:

- **Equity Lens:** We identified twelve standards pertaining directly to equity and diverse learners to help prepare teachers for Minnesota’s increasingly diverse student demographics.
- **Families as Partners:** We identified five standards related to family collaboration across five of six subparts, which we believe are critical to supporting student success.
- **Teacher/Student Relationships and Student Ownership:** We identified sixteen standards that aim to support student success, ownership, and learning potential through positive peer and teacher relationships and personalized learning.
- **Social Emotional Learning:** We identified seven standards with language pertaining to social emotional learning (SEL) success. We agree teacher candidates must be able to create SEL learning spaces that promote success.

Recommendations for Changes to Draft 1

While we sincerely applaud this first draft, and PELSB’s efforts to shift the way the state of Minnesota prepares teachers for the next generation of scholars, we respectfully ask for the board’s consideration of the following feedback and recommendations, in six key areas:

1. Reflections on Race, Privilege, and Implicit Bias Require Action

   **Educator Feedback:** We received specific feedback on the lack of expectations for teacher awareness of how racialized experiences impact both students and teachers. Educators expressed concern that if teachers are not actively reflecting on their own biases or failing to examine how their own privileges show up, they risk perpetuating more harm in their learning communities. One educator remarked that “white teachers cannot go in with their savior complexes. How can they use their problem solving lens, rather than going in and trying to save their students?”
New America’s recent report, *Culturally Responsive Teaching*, identifies reflecting on one’s own cultural lens as one of eight competencies of culturally responsive teachers: “*Culturally responsive educators routinely reflect on their own life experiences and membership in various social groups (such as by race, ethnicity, social class, and gender), and they ask themselves how these factors influence their beliefs about cultural diversity... They actively work to develop cultural competency: understanding, sensitivity, and appreciation for the history, values, experiences, and lifestyles of other cultures.*”

**EE’s Analysis:** We also found language in seven standards concerning teacher reflection, biases, and microaggressions to be too vague, passive, and lacking in actionable next steps. For example, Standard 43 states that teachers must regularly reflect on the impact of biases and microaggressions on the classroom and instruction. While we noted seven other related standards, there is no evident language requiring teachers to take meaningful action to continually adapt their practices to be culturally responsive. Conversely, Standard 39 requires teachers to “facilitate culturally responsive, research-based, student-centered classroom management,” but doesn’t ask teachers to reflect on their own biases.

What teachers say and do in their classroom are influenced by their thoughts. The beliefs teachers hold not only shape teachers’ pedagogy but also shape classroom interactions. When teachers are more self-aware, they can better shift their teaching practices to support stronger academic outcomes.

**Specific Recommendations To Improve In Area 1:**

**Recommendation 1A:** Consider adding the following standard (from Kentucky Teacher Performance Standard #9, adapted slightly): “The teacher shall engage in ongoing professional learning, shall use evidence to continually evaluate his or her practice, particularly the effects of his or her choices and actions on others, such as learners, families, other professionals, and the community, and be willing to adapt practice to meet the needs of each learner.”

**Rationale:** This language supports teacher effectiveness by moving reflection and understanding beyond admiring the problem, toward a practice of continuously adapting and improving instruction to meet the needs of each learner. Teachers must be willing to change their instructional practices based on what they hear from students, families, and community.

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Recommendation 1B: Consider adding the following standard from Michigan (adapted slightly) to the Instruction section: “Discern the extent to which personal belief systems, biases, and values may affect instructional practices and grading, and adjust instruction and interactions accordingly on an ongoing basis.”

Rationale: To be culturally responsive, teachers must have a deeper understanding of their own frames of reference (e.g., culture, gender, language, abilities, ways of knowing), the potential biases in these frames, and their impact on expectations for and relationships with learners and their families.\(^8\) Not only should teachers have an awareness of themselves and their biases, they must be able to take action. Note: We are aware that this proposed standard has similarities to current Standard 53, however our proposed text is to be added to the Instruction section, and deals directly with instructional practices and grading, which are distinct from a general understanding of bias.

Recommendation 1C: Amend Standard 39 as follows: “Facilitate culturally responsive, research-based, student-centered strategies for classroom engagement, management and schoolwide positive discipline intervention and prevention strategies, and restorative practices that address the social and mental health needs of the child with the goal of keeping all students in school and on course toward graduation”

Rationale: Educators commented that “classroom management” is a phrase rooted in deficit thinking about students, which seems to be odds with the intent of this standard; they suggested “engagement” is a better word and a better practice to encourage.\(^9\) We also heard the importance of using “restorative practices” to support the overarching goals of this standard, by strengthening school climate, building community, repairing relationships, and creating just and equitable learning environments for all students.\(^10\)

Recommendation 1D: Amend Standard 43 as follows, “regularly reflect on the impact of biases and microaggressions on the classroom and instruction, and develop and use actionable strategies to reduce these impacts accordingly”

Rationale: Per the feedback and analysis at the start of this section, this amendment supports teachers to take ownership and action rather than dwell only in reflection.

Recommendation 1E: Amend Standard 54 as follows, “regularly reflect on the ability for implicit bias to shape discretionary spaces and the role this can play in reproducing or disrupting the myriad small

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\(^8\) Council of Chief State School Officers. (2013, April). Interstate Teacher Assessment and Support Consortium InTASC Model Core Teaching Standards and Learning Progressions for Teachers 1.0: A Resource for Ongoing Teacher Development. Washington, DC.


\(^10\) The Minnesota Department of Education also supports this practice; see more at: [education.mn.gov/MDE/dse/safe/prac/](http://education.mn.gov/MDE/dse/safe/prac/)
decisions teachers make each day, and develop skills to both avoid reproducing bias and disrupt
systems of oppression in schools;”

Rationale: Per the feedback and analysis at the start of this section, this change asks teachers
to take ownership and action from their reflections. Additionally, we suggest replacing the
abstract phrase “discretionary spaces”, which could be interpreted in different ways, and instead
fully spell out the concept as coined by Deborah Loewenberg Ball: the myriad small decisions
teachers make each day.11 This is too important an idea to be obfuscated behind an abstract
phrase that may not be understood by all.

2. Expand Upon Standards Supporting Overall Student Wellness

Educator Feedback: We received feedback from educators on the relative lack of mental health content
overall. And many stated that while they believe that teachers should not be required to become
experts in mental health, the standards should more strongly support teachers having some
understanding of how to address trauma in the classroom. One educator asked why there was no
standard about how schools can trigger trauma.

Another theme we heard repeatedly is that serving the needs of students should be a collaborative
effort between teachers and other adults in the school, including nurses, counselors, psychologists,
social workers, and others. It’s critical that new teachers understand these other adult roles, and how to
interact with them as a teacher to meet the broader set of student needs. Numerous recommendations
below reflect this feedback.

Specific Recommendations To Improve In Area 2:

Recommendation 2A: Amend Standard 12 as follows: “understand the needs of students with physical
or health disabilities and know how to use strategies and resources to support these needs, including
collaboration with special education teachers, nurses, and other school health professionals;”

Rationale: We received feedback from educators that truly meeting the needs of students with
physical and health disabilities requires a collaborative effort not just with other teachers, but
with other health professionals in schools, in particular school nurses.

Recommendation 2B: Amend Standard 13 as follows: “recognize mental health symptoms and the
impact of mental health disorders on learning, and know how to use strategies and resources to
address these symptoms, including collaboration with counselors, social workers, and school
psychologists;

Education.” presented at the AERA 2018 Annual Meeting, New York, NY, April.
https://www.youtube.com/watch?v=JGzQ7O_SIYY.
Rationale: While all teachers need to understand strategies and resources they can themselves use to address mental health concerns, it is also critical to break down traditional silos between classroom teachers and other education professionals in supporting students with mental health needs. Standards 11 and 12 already use similar language to what we suggest here with respect to special education teachers; we recommend following that pattern here in Standard 13.

Recommendation 2C: Amend Standard 14 as follows: “understand how to support students who have experienced trauma, homelessness, foster care, incarceration, or are medically fragile, including through collaboration with counselors, social workers, and other school personnel;”

Rationale: Similar to the rationale for Recommendation 2A, teachers both need to develop their own skills in working with students who face these challenges—but also need to know how to draw on the expertise of other adults in the building to meet these student needs.

Recommendation 2D: Add to Standard 15 as follows: “understand the diverse impacts of trauma on learning, development, and behavior; how schools can trigger trauma in students; and know how to use strategies and resources to ameliorate and address these impacts, in collaboration with counselors, social workers, and other school personnel;”

Rationale: We received feedback from educators that teachers need to know not only how to support students dealing with trauma, but avoid actively contributing to trauma, which schools do too often for many students and communities. Additional, similar to the rationale for recommendation 2A and 2C, teachers both need to develop their own skills in working with students who face these challenges—but also need to know how to draw on the expertise of other adults in the building to meet these student needs.

Recommendation 2E: Add to Standard 16 as follows: “Recognize the distinguishing characteristics of reading disabilities, including dyslexia, and understand how to implement appropriate interventions and collaborate with special education staff.”

Rationale: This recommendation is consistent with similar recommendations above, about meeting the needs of students through partnerships with special education teachers.

3. Deepen & Clarify Standards Around Family & Community Partnerships

Educator Feedback: We spoke with a number of educators who believed it was important for teacher candidates to see families as partners, and demonstrate that they know how to both engage and foster culturally responsive relationships with families. One educator added that teachers must build relationships with both families and community, and see themselves as community members. Research

supports this, and adds that “culturally competent teachers continually seek to learn more about the local community as well as families and their cultures and values.”

**Specific Recommendations To Improve In Area 3:**

**Recommendation 3A:** Replace Standard 8 with a more meaningful and measurable standard, like the following Standard 6.2 from Indiana’s teaching standards (adapted slightly): “Understand diverse family and community characteristics, structures, dynamics, roles, relationships, and values and understand how to use this knowledge to build effective partnerships with diverse families and communities.”

*Rationale: The first section of the standards, Student Learning, should have some “understand” standard related to family and community partnerships. However, we heard feedback from those who have done extensive family and community engagement work that Standard 8 as currently written is not meaningful or measurable, and there is no language related to teacher connection to community. The standards language suggested above speaks much more concretely and directly to the sort of understandings that would underlie healthy family/community partnership.*

**Recommendation 3B:** Revise Standard 51 to focus on first building requisite trust and communication with families: “Work collaboratively with students and their families to establish trusting relationships; communicate in ways that are recognize different cultural, ethnic, and social modes of communication; and establish mutual expectations and ongoing communication to support student development and achievement.”

*Rationale: Research is conclusive that all meaningful relationships with family are rooted first in trust. Part of developing this trust is recognizing that communication must be two-way, involving both vulnerable listening on the part of educators, to learn about family assets, needs, and context, in addition to conveying what is happening with students at school. We also add emphasis on understanding diverse modes of communication (drawing language here from Alabama). Upon this foundation of trust and two-way communication, then mutual expectations to support learning can be built.*

**4. Go Beyond Collaboration And Emphasize True Teacher Leadership**

**Educator Feedback:** In interviews for this memo, several educators expressed desire to have larger roles in school decisions but have often felt overlooked as true professionals. They wish that teacher preparation had given them more exposure to forms of school governance and leadership where they would be afforded these larger roles. This is consistent with broader themes we heard and conclusions we reached in our recently completed year-long research project asking how to create school

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conditions where teachers stay and thrive in the profession, and with our larger body of work on schools designed and run by teachers, i.e. teacher-powered schools.

Specific Recommendations To Improve In Area 4:

Recommendation 4A: Revise Standard 58 as follows: “Be able to work collaboratively with other adults and develop skills in collaborative interaction that support a positive school climate to build a shared vision, foster a supportive culture, challenge practices that harm student learning or development, identify common goals, and monitor and evaluate progress toward those goals and build on the skills and strengths of all educators.” Then, reorder this standard such that it appears directly before Standard 65.

Rationale: The language of Standard 58 was originally based on InTASC standard 10(c), which contains within it key skills exercised by teachers in developing collective efficacy—one of the most powerful predictors of student and school outcomes. However, in the language that appeared here in draft 1, Standard 58 was broadened and made conceptually diffuse. We suggest returning this standard closer to InTASC 10(c), to focus on skills with deeper links to well-studied determinants of collective efficacy (while still keeping the mention added in Standard 58 about challenging practices that harm student learning or development). Additionally, we suggest reordering this to directly before Standard 65 because the two are conceptually related, on the topic of larger teacher leadership roles in schools.

Recommendation 4B: Amend Standard 61 as follows: “Understand laws related to student rights and teacher responsibilities, such as for educational equity, appropriate education for students with disabilities, confidentiality, privacy, appropriate treatment of students, data practices, and mandatory reporting requirements in situations of known or suspected abuse or neglect, and other policies germane to the teaching profession, their school, and the students they serve.”

Rationale: We maintain the position and rationale presented in our June 2019 memo, that teachers must have awareness of policies that impact their classrooms and schools, including policies that impact their students.

Recommendation 4C: Revise Standard 65 as follows: “be able to seek appropriate leadership roles and opportunities to take responsibility for student learning, and understand leadership models where teachers, collaboratively with their colleagues, make final decisions about school curriculum, learning model, budget, staffing, and other areas via leadership teams, committees, rotating leadership

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16 See: www.educationevolving.org/initiatives/retaining-teachers
17 See: www.teacherpowered.org
positions, and hybrid leadership roles: to collaborate with learners, families, colleagues, other school professionals, and community members to ensure learner growth; and to advance the profession.”

Rationale: The language of Standard 65 was vague and diffuse, focused both on teacher leadership roles as well as community collaboration. We have already offered recommendations explicitly focused on collaboration with students, families, and communities in Section 3 above, and recommend focusing this standard on teachers exercising larger professional roles to run schools. Education Evolving has extensively studied schools where teachers have larger profession roles, including a synthesis of practices present at these schools, on which the language of our recommendation is based. Teachers having greater collective agency and efficacy in school decision-making has extremely strong correlations with student achievement as well as teacher satisfaction and retention.

5. Strengthen Standards on Student-Centered Learning and Personalization

Educator Feedback: Several educators identified the need for teachers to adjust to the unique needs of each learner in the classroom, and that teachers must be able to adapt the curriculum to meet the needs of each student. This is consistent with the themes that we heard from teachers around the state, which led to the development of our seven principles of student-centered learning.

EE’s Analysis: The draft standards include a much greater emphasis on understanding students as individuals, with their own unique interests, identities, aspirations, and education needs. There are numerous standards that deal with differentiation and personalization, however, we recommend refining and building on those standards even further.

Specific Recommendations To Improve In Area 5:

Recommendation 5A: Add the following (taken from Standard 1.3 from Ohio Standards for the Teaching Profession) as the first standard in the Professional Practices section: “Establish and clearly communicate high expectations for all students through such actions as focusing on students’ positive traits and conveying a belief in their abilities.”

Rationale: We consistently hear from educators that a foundational requisite for equitably serving each unique student is upholding high expectations and a belief in the potential of every
student. Academic research has for decades\textsuperscript{24} established that teacher expectations have a significant and substantial impact on achievement, in particular in either ameliorating or exacerbating achievement gaps.\textsuperscript{25} We welcome other suggestions on language around high expectations, but having some explicit reference to this teacher skill is critical.

Recommendation 5B: Merge Standard 20 and Standard 26, which are extremely similar. This could be accomplished by removing Standard 26 and amending Standard 20 as follows: “plan and implement learning experiences based on evidence-based and diverse types of instructional strategies that are developmentally appropriate and meet the needs of individual students across all levels and types of exceptionalities, including their cognitive, social, emotional, cultural, and linguistic needs;”

\textit{Rationale:} As written, Standards 20 and Standard 26 are extremely similar. In terms of a demonstrable standard, the acts of planning and implementing the types of learning experiences described are highly related and, as such, should be combined.

Recommendation 5C: Amend Standard 21 as follows: “Modify instruction to make language and content comprehensible and instruction-learning relevant, accessible, and challenging for each individual student, including with assistance from educational technology.”

\textit{Rationale:} This standard seems to move in the direction of personalization, student-centered learning, and meeting individual student needs, but doesn’t go far enough. In order to be equitable, learning must be relevant, accessible, and challenging for each unique student—not just adapted to the full group. Additionally, educational technology is increasingly used to assist teachers with this differentiation,\textsuperscript{26} and new teachers should have exposure to these tools.

Recommendation 5D: Amend Standard 31 as follows: “Use students' thinking, interests, and experiences as a resource in planning and modifying instruction”

\textit{Rationale:} As a part of a differentiated, personalized, student-centered approach, teachers should draw on student interests as a means to engage them in the classroom. Students are more likely to absorb and retain information when they are interested in a topic and see relevance to their lives.\textsuperscript{27}

Recommendation 5E: Add to Standard 32 as follows: “Integrate culturally relevant content to build on students' background knowledge and interests.”

Rationale: See rationale for the above recommendation.

Recommendation 5F: Amend Standard 37 as follows: “Collaboratively implement norms and routines for classroom discourse and work, including using educational technology and organizational routines that promote students' positive identity development, limit learning disruptions, strengthen relationships, and incorporate students' lived experiences and cultural frameworks”

Rationale: We heard from educators that this standard seemed like “a lot”—like there were too many disparate ideas packed into one standard. This standard covers similar ideas to Standard 34 and Standard 35; however, the ideas about incorporating lived experiences and cultural frameworks in order to support positive identity development are extremely important and not mentioned in another place in this section. Our suggestion here attempts to focus this standard on the unique elements—removing redundant and scattering references to education technology, organizational routines, and learning disruptions.

Recommendation 5G: Reorder Standard 42 (regarding building respectful relationships with learners) such that it is the first standard in the “Environment” section (currently this would mean locating it immediately preceding Standard 34).

Rationale: Strong evidence suggests that forming positive relationships with students is the requisite foundation upon which all learning is built. The ordering of this standard should reflect this importance.

Recommendation 5H: Consider adding a standard specifically on teachers enabling applied, real-world learning opportunities, such as service learning, community-based learning, project-based learning, youth participatory action research, and/or other learning opportunities.

Rationale: While we defer to those who have more investment and expertise on this topic, and who testified publicly, we did receive feedback from several educators who believe that teacher prep should include coverage of a service learning approach and/or other real-world, applied learning approaches.

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6. Revise and Reorder Standards To Increase Logical Coherence And Flow

Recommendation 6A: Reorder current Standard 11 (related to emotional, behavioral, cognitive and learning disabilities) and Standard 12 (related to physical or health disabilities) such that they immediately precede Standard 16 (related to reading disabilities).

   *Rationale: Increase coherence by grouping standards that relate to differently abled students.*

Recommendation 6B: Amend Standard 23 as follows, “use educational theory and education research to support and adapt methods of instruction.” Then, remove Standard 62.

   *Rationale: Standard 23 and Standard 62 are nearly identical and should be merged. In practice, “support” and “adapt” are operationally very similar and it makes sense to reduce duplication by combining these standards.*

Recommendation 6C: Reorder current Standard 27 (related to asking questions to stimulate discussion) such that it immediately follows Standard 24.

   *Rationale: Increase coherence by grouping standards that relate to student discussions.*

Recommendation 6D: Reorder current Standard 38 (related to establishing and managing small group work) to the section “Instruction” rather than “Environment” where it is currently located.

   *Rationale: Small group work is a pedagogical approach that differs from the other standards in this section. It would fit better among the other standards in the Instruction section.*