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Commissioner of Education

KENTUCKY DEPARTMENT OF EDUCATION

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October 7, 2019

Mr. David Wickersham, Director
Office of Education Accountability
475 Coffee Tree Road
Frankfort, KY 40601

Re: Office of Education Accountability's (OEA) draft report on Teacher Shortages

Dear Mr. Wickersham:

Thank you for providing the Kentucky Department of Education (KDE) an opportunity to review OEA's draft report on Teacher Shortages. Given this topic's importance to Kentucky's students, local school districts, and our Commonwealth, KDE is pleased the Education Assessment & Accountability Review Subcommittee and OEA are exploring this issue.

Below, please find the Department's feedback on the draft report.

OVERALL

The term "alternative certificate" or "alternative certification" is used repeatedly throughout the report, especially in Chapter 2.

KDE Response: With the exception of Option 4, completion of an alternative route to certification outlined in KRS 161.048 results in a professional certificate – the same certificate awarded through the traditional route to certification. In other words, there is no "alternative certificate." Rather, the certificate is the same; it is simply the route to obtaining that certificate that is different. Furthermore, the use of the term "alternative certificate" creates the misconception that the certificate obtained through alternative route to certification is lesser than the certificate obtained through the traditional route. A more accurate term would be "certificates obtained through an alternative route to certification," and KDE requests that this be corrected throughout the report.

CHAPTER 2

Routes to Certification (page 1):

The Office of Educator Licensure and Effectiveness (OELE) at KDE issues teaching certificates and is responsible for the preparation and certification of educators in Kentucky, including establishing standards and requirement for teacher preparation programs' teaching certificates.

KDE Response: Under KRS 161.028(1)(a), the Education Professional Standards Board (EPSB) has the statutory authority to set the standards and requirements for obtaining and maintaining a teaching certificate. In addition, as correctly noted on page 3, KRS 161.030 provides that “the certification of all teachers and other school personnel, in public schools only, is vested in the Education Professional Standards Board.” In accordance with Executive Orders 2018-653 and 2019-464, the EPSB retained those powers granted under KRS 161.028 and 161.030 and was attached to KDE for administrative purposes. The Office of Educator Licensure and Effectiveness (OELE) provides staff to the EPSB, but the EPSB sets the standards and requirements for obtaining and maintaining a teaching certificate. All reference to KDE, KBE and/or OELE performing powers granted under KRS 161.028 should be revised to the EPSB.

Average Years Taught With Alternative Certificates And Emergency Certificates (page 12):

KRS 156.160(2) allows school districts to request that KBE waive administrative regulations pertaining to K-12 education. KBE may approve waiver requests if the school or school district can show that the alternative approach will fulfill the purpose of the administrative regulation, that the school would otherwise experience a hardship, or if there is good cause. Waivers may be requested for the administrative regulations pertaining to emergency certificates and certificates gained through the eight alternative routes.

KDE Response: KRS 161.028(1)(r) allows the EPSB to waive a requirement in an administrative regulation promulgated by the EPSB. Title 16 of the Kentucky Administrative Regulations contains those regulations promulgated by the EPSB. Thus, the correct reference here would be to KRS 161.028(1)(r), not to KRS 156.160(2).

Recommendation 2.2:

The Kentucky Department of Education should consider a method to differentiate between positions that are open and those that have been unfilled for a long period of time in the Kentucky Educator Placement System.


KDE Response: KDE recognizes that the Kentucky Educator Placement System (KEPS) could be improved and, as the report mentions, is working to obtain a better platform that will allow more functionality and flexibility. In the meantime, the current version of KEPS does allow an individual to view all postings and sort those posting by the posting date. This allows an individual to see what postings have been posted for a longer period of time.

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KDE appreciates the opportunity to submit the foregoing information to OEA. On behalf of KDE, we appreciate the work your office does for students in the Commonwealth.

If additional information is needed, please contact General Counsel Deanna Durrett at (502) 564-4474 or Deanna.Durrett@education.ky.gov. Thank you for your consideration.

Sincerely,



Wayne D. Lewis, Ph.D.
Commissioner of Education

CC: Sen. Max Wise, Co-Chair, EAARS
Rep. Brandon Reed, Co-Chair, EAARS
Sen. Alice Forgy Kerr
Sen. Gerald A. Neal
Sen. Mike Wilson
Rep. Regina Huff
Rep. Steve Riley
Dr. Bart Liguori, LRC
