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ELLEN BERNSTEIN
PRESIDENT

January 3, 2023

To: Dr. Kurt Steinhaus, Secretary of Education for the state of New Mexico

From: Dr. Ellen Bernstein, President, Albuquerque Teachers Federation

Re: Comments on behalf of the over 5,000 licensed teachers in the Albuquerque Public Schools to the New Mexico Public Education Department concerning the proposal to repeal and replace rule 6.60.6 which establishes the requirements for individuals holding New Mexico licensure who are seeking continuing licensure.

In December of 2022 the Albuquerque Teachers Federation (ATF) conducted a survey of the licensed teachers in the Albuquerque Public Schools (APS) about the proposed rule change.

We explained that although the PED already announced that they are changing licensure advancement from a dossier system to a micro-credentialing system there is a rule making process and we asked for their feedback. This chart (link) described for the teachers the differences between the two systems.

	Dossier	Micro-credentials (APLI-II)
requirements	Licensure advancement is based on a Professional Development Dossier (PDD) that includes evidence of a teachers' practice in nine teacher competencies divided into three strands: <ol style="list-style-type: none"> 1. Instruction 2. Student learning 3. Professional learning 	Licensure advancement is based on the successful completion and demonstrated mastery in five "micro-credentials" areas. <ol style="list-style-type: none"> 1. Classroom environment 2. Multi-layered systems of support 3. Assessment literacy 4. Culturally linguistically responsive instruction 5. Family engagement
process	The PDD is a reflective process in which teachers describe why they make the instructional decisions they make and the impact those decisions have on student learning. The Dossier requires teachers to explain how they know whether students are making progress, and what targeted instruction they need to provide to help their students make progress.	Micro-credentials are a skills-based/competency-based process made up of several on-line courses, each focused on a discrete skill or area aligned with the educator evaluation system. There is a reflection process embedded in each credential.

	Teachers show professional growth they have made in Strand C, by detailing how they have investigated and implemented change in their practice, as well as how they collaborate with others for student learning.	Can be completed “step by step.” The successful completion of each micro-credential will make an educator eligible to progress to the next micro-credential.
Time requirement	Must be submitted as single, completed compilation. Submitted in the 3 rd to 5 th year of teaching, or any time after teaching 3 years on a Level 2 license. A Dossier is expected to take up to one year to complete.	One micro-credential course takes 6-12 weeks to complete. Must be completed by the 5 th year with a level 1 license. Year 1 and 2 educators are encouraged to begin process for Level II license “as soon as they are able” because program is designed to take approximately 15 months.
Success criteria	Passing for each strand is based on “exceeds standards/meets standards/does not meet standards” rating system. Strands either pass or do not pass. Strands can be resubmitted.	Micro-credential courses are considered completed upon demonstrating mastery of 85 percent or higher.
Cost	Initial submission fee is \$320. Fee for resubmission of one or two strand is \$110 per strand. Fee for complete resubmission is \$320.	Fee for each micro-credential is \$60 each, for a total of \$300.
Advancement Criteria from Level 1-2	Successfully passing all three strands of the PDD; and completion of the mentorship requirement for beginning teachers.	Successfully completing APLI-II or receiving certification from the national board for professional teaching standards; and completion of the mentorship requirement for beginning teachers.
Advancement Criteria from Level 2-3	Successfully passing all three strands of the PDD, a master’s degree or a certification from the national board for professional teaching standards	Successfully completing APLII-III, a master’s degree or receiving certification from the national board for professional teaching standards.

We asked the following questions:

Have you completed a dossier?

- Yes
- No
- Yes, twice

Do you agree with the changes proposed by the PED.

- Yes – why
- No -why

Do you have concerns about this change?

Do you have questions about this change?

Elementary teachers:

ATF is concerned that the micro-credentialing work on top of the LETRS requirement is a heavy lift for beginning teachers.

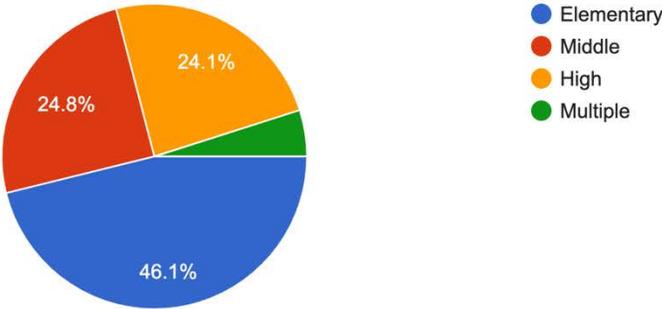
Do you share that concern?

- Yes
- No
- Please comment

ATF Survey Results:

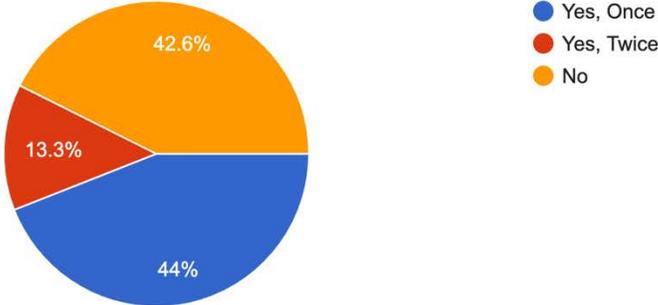
At what level do you teach?

427 responses



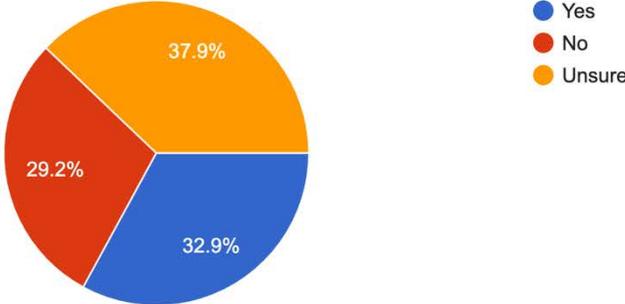
Have you completed a dossier?

427 responses



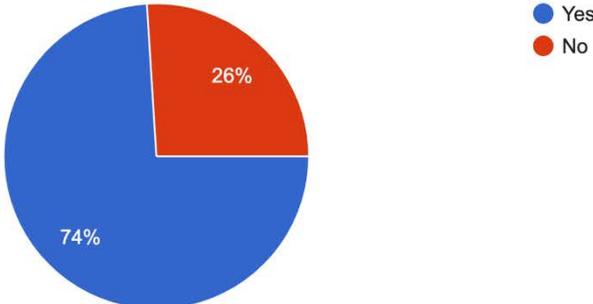
Do you agree with the changes proposed by the PED.

425 responses



Elementary teachers: ATF is concerned that the micro-credentialing work on top of the LETRS requirement is a heavy lift for beginning teachers. Do you share that concern?

304 responses



Sample Comments:

Teachers who agree with the change

It is a different type of pathway that allows teachers to work on their credentials without creating too much burden in a single semester.

I feel the microcredentials are a more structured and more instructive process

The courses will hopefully give new teachers more teaching techniques and strategies. The course work seems to be less subjective than someone grading work based on a rubric. The lower cost is simply respectful. The fact that we have to pay in order to advance our levels is ridiculous especially when it is required that everyone advance from level 1 to 2.

Yes! If I understand it correctly, I am able to move from a level 2 to a level 3 without a Masters Degree and Dossier. I would have gone to grad school already but having to go to grad school and then also spend a year completing the Dossier just seemed like a slap in the face. The whole process was not worth it. I understand this new process is still a lot of work and time investment but sounds overall more accessible than a Masters + Dossier.

Just as in the field of education, educators understand that students have strengths in different areas and need multiple opportunities and avenues to demonstrate proficiency, these same expectations need to be expanded to educators themselves. Taking into account the stresses and mental health of educators' personal/professional lives the micro-credential avenue for licensure advancement elevates some of the stress associated with successful submission, evidence gathering, and reflection of the three strands for the dossier.

In my opinion, it's better to train better teachers through micro-credentials than it is to have them write an essay that will be skimmed over. It would be nice to be able to substitute some of these micro-credentials for other extended learning credits. However, the quality and ethics of the organization does matter.

I have heard from and seen many amazing teachers struggle with the dossier process for a variety of reasons; teachers have struggled for reasons that go beyond their professional capabilities and capacities. For instance, paying \$300+ dollars to advance is a lot of money, especially for a level one teacher! Further, APS has denied me the ability to even begin my dossier, even though I am in my fourth year of teaching, because I did my first two years of teaching in Taos.

I am in support of this change because being able to advance my license within the next year doing the microcredentials gives me the clear pathway to advancement that I have been denied as a teacher who began teaching in the 18-19SY, one year before COVID hit and disrupted teacher evaluations.

I believe that by taking classes specifically designed for teacher development and mastery of what they are teaching would be better than having a teacher put together the massive details of how the dossier

is to be completed independently. I appreciate direct instruction.

I like the fact that it is a course-based advancement. I feel like it will be easier for me to fit into my life between work and family commitments. I also like that you can start it in advance of your actual leveling up.

Having the micro-credential courses that are skills-based rather than reflection-based will more properly justify good teachers for keeping jobs and provide more flexibility to meet the 85% completion online, rather than only getting feedback from a failed dossier strand after-the-fact.

I believe it will feel more attainable to complete while teachers are working. It also is more financially attainable since it is not expecting teachers to pay a large lump sum all at once with the fear that they will have to pay it again if not passing a strand.

Allows teachers to move at their own pace and is not a "one shot" deal. Seems less stressful. Hopefully the micro credentials are more relevant to the actual classroom experience and not just how well one can write a paper. I have seen really poor teachers write a great Dossier and really great teachers not pass their dossier. Also Micro credentialing allow from breaks if needed for family time/a baby etc. Dossier HAS to be done in one year.

Teachers who do not agree with the change

The new proposal changes a practice-based dossier that can be completed at one's own pace into a ridiculous amount of coursework to be done over 15 months. These changes weaken the licensure process into busy work as opposed to the current academic self-directed dossier. It's like going backwards in progress from an engaging project-based learning modality to a tedious multiple-choice test. This is exactly the opposite of what teachers are supposed to be doing in practice; student ownership. The proposed changes reduce teacher ownership. It also reduces the likelihood of teachers staying in our field.

The Dossier Process is more streamlined and faster for teachers to advance to the next tier. Micro-credentialling is just another way to make the advancement process longer and puts more work for teachers who have more than enough duties to do in their jobs. The Micro credentialling process should not take more than 1 year like the dossier process.

The process sounds great for someone who started teaching right after college. But for the teachers who made a career change to teaching and already have a Master's or Doctorate are at a great disadvantage. I do not wish to spend more money on a program or to be nationally board certified when I would like to obtain my doctorate and move into administration. It would be helpful to have the micro-credentials in hours required instead of weeks. I applied to start my dossier earlier this year and was denied because I did not have 3 evaluations. I will have my third evaluation in January 2023 which

means I won't finish the new program until around June 2024. I had already created a timeline and goal for the dossier. Under the new program, I would have not been denied earlier this year. Now teachers who have less experience than me will move to level 2 at the same time as me and many will not have a master's degree.

I think the credentialing process takes the most beneficial part of doing the dossier - it is an incredible professional development exercise and also allows teachers to practice the type of reflection necessary to complete National Board Certification in the future. I think that if changes want to be made, they should be made to the questions the Dossier asks (to include aspects that are important to the PED but that are not covered as in depth in the Dossier). Completing an "online" course is a joke and a waste of time. Completing a Dossier on the other hand forces teachers to think about why they do what they do in the classroom and how they can work to improve.

Teachers should still be given the option to write a dossier on our own time and pace and not have to be locked into micro-credential timelines.

It seems like too much to manage. I would much prefer to complete the dossier at my own pace instead of needing to map out my plan for the mini credentials (if I was at that point in my career.) I can imagine it will be a deterrent for some.

Having completed both the Dossier Process (once) and the National Board Certification process, I liked that the Dossier process aligns (somewhat) with what is expected on the National Board Certification. I don't think it should change. The Dossier Process also allowed some flexibility for teachers to work at their own pace.

I believe the dossier is a more rounded approach for evaluation and completion. Enacting so much extra coursework is even more on a teacher's plate.

The micro credentialing process is not yet guaranteed to provide feedback and two-way communication. Without that guarantee, it's just more hours of watching videos (like the 18 hours at the beginning of each year) and completing paperwork, without improving practice.

The dossier process was very effective in giving me the tools to really reflect on my teaching practices based on the 9 competencies that I was supposed to demonstrate. I did this for level three as well and was able to think even more into my teaching practice. From what I can ascertain, the new micro-credentialing rule requires more time of the teacher and less reflecting. It costs about the same from what I read in the chart but seems to tax the teacher more in terms of time outside of the workday. I would be overwhelmed trying to complete LETRS Training on top of those online courses if that were the pathway to advanced licensure. I already feel like our plates are more than full now that we are doing MTSS plans for attendance (for example). If PED wants to add in MTSS or MLSS as part of the dossier, then why not add a few questions that pertain specifically to that? Also, how do teachers show they are reflecting on their practice (much like they are required to do in the National Board Submission Process)? This credential pathway seems like it only requires that 85% pass rate.

The microcredentialing process, especially regarding the implementation and management of MLSS plans is highly subjective. How and why should a teacher be evaluated on the process of writing and implementing these plans; if the teacher focuses on Strand B- student learning, this is a deeper look into the demographic and dynamic in the classroom this component is self-explanatory. There are different ways to gauge if a teacher is implementing these plans. All of the current strands in the three-tier licensure system are objective, reflective and much more meaningful than a microcredentialing/micromanaging process.

The requirement for reflection inclines the applicant to critically consider what he/she will do in the future. "Embedding" the reflection into a skills-based, online program lessens this much-needed consideration. As well, by not requiring a masters or NBTC, we have dumbed down the teacher requirements just like what is being considered by PED right now (removing Algebra II from graduation requirements).

First, I am not sure why the dossier needs to be replaced. Secondly, I found that the process of the dossier was very reflective from beginning to end. I believe each time I completed one, I became a better teacher. As explained, the new system has teachers completing modules, which sounds expensive to me, but also doesn't engage them in the process as much as a dossier. The dossier is something for teachers to be proud of because it is we take ownership over something we have written and designed. Going through many modules sounds like memorization and application, boring!

Teachers who are unsure about the change

I'm interested in whichever process ensures better mastery and practice, while respecting our limited time and resources as active teachers. I'm close to leaving the profession altogether because of the many hoops and now extra costs.

It appears like teachers who are currently composing their dossier will be forced to wait another two years before advancement, which financially outweighs the \$20 they might save doing the micro-credentials. We get paid too little as it is.

I never had to complete a dossier to advance to level 2 because my student test scores were high enough that I didn't have to. However, I have looked into the dossier system and requirements, just in case. With that in mind, I like that the micro-credential system is "self-paced" and online, making it much more accessible than the dossier was. I'm not sure what the "courses" will actually look like, hence the "unsure" answer above, but I hope it's a huge improvement to the dossier system.

The proposed method of advancement seems to be straightforward, as well as cheaper. I am unsure how this will look in practice, and I am concerned about availability/time requirements. I would support having the option to choose a method until the process of micro-credentials has been shown to work well.

I am currently taking the first class. It has a lot of great information, and I feel like it is definitely benefiting my students. My only issue is that it is a little difficult to fit it in with all of the paperwork; not that big of a deal. My major issue is that I will not be able to be level 2 for a year and a half. I am still considering writing my dossier for this reason.

I think it sounds fine. However, I am starting my 5th year of teaching this upcoming August. I was completing my alternative licensure the first two years and then. I have been enrolled in LETRS this year and last so I have been planning to complete the requirements for leveling up next year. But the info provided for this new system says it will take 15 months. Will they have the program up and running in time for teachers to complete it within the needed time frame?

The systems seem similar and comparable in structure, time, and cost. The PDD is more educator driven while the micro credentials are PED driven. However, the topics addressed in the micro credentials are severe gap areas in NM public education.

I like that the micro-credentialing is skill based, however, I have some concerns. The first is that it takes over a year to complete, while the dossier is only one year. This means it will take longer to level up and receive a raise. I'm also concerned that the classes filled up so quickly, which makes the process take even longer. If it is all self-paced then there should be enough spots for all teachers and we should be able to complete it in one year.

I think it would depend on when the change takes place. I know a lot of teachers who are very close to being able to move up in a level. For them to have to start with this huge number of classes now instead of being able to be grandfathered in to writing a dossier may cause some teachers to leave the profession. If it applies starting only with new teachers or teachers who just moved to level 2, I could be in favor of it. I think the amount of time needed to complete it is a lot to ask of teachers, especially those who are already being asked to devote a lot of time outside of the duty day to LETRS training.

I'm wondering if the time commitment would be overwhelming for a first or second year teacher. They have several other requirements as they start their career. Would these courses make their lives harder or actually help them in building their lessons?

While the idea of micro-credentialing has the potential to assist educators in deepening their skills as professionals, I'm concerned about the particular micro-credentialing course types being mandated. Education is such a diverse profession and giving educators the ability to select which micro-credentialing courses they would like to fulfill from a predetermined list from the PED would allow educators to focus on areas, not only of interest, but of the most relevance to their area of instruction.

ATF is concerned that the micro-credentialing work on top of the LETRS requirement is a heavy lift for beginning teachers.

Comments from elementary teachers in agreement:

As new teachers we are required to attend LETRS training, TELL training while some teachers are going to grad school and continuing their professional development. It's a lot of added training for new teachers.

When are we supposed to teacher and plan? My students and family will suffer!

Teachers already have so much on their plate, their voices must be heard!

Teachers go through a rigorous process to get certified in the first place. Putting more and more unnecessary burdens on them will not improve our public education system in New Mexico. It will only drive teachers to other professional fields where they are actually treated as professionals.

Both proposals are very, VERY TIME CONSUMING. As educators we can only do so much on top of our regular workload.

Teacher retention must be the number one concern. The drop-out rates of teachers within the first five years of teaching is a huge concern.

I had to complete LETRS training twice since I did it in person and missed a day and doing it online was extensive and would rather have done it in person. Feel the stress of paperwork already on the new teacher's caseload is enough for now.

Comments from elementary teachers not in agreement:

I was in the first phase of LETRS, and it is quite a bit of work. HOWEVER, I do not believe that LETRS and micro-credentialing are themselves similar enough to warrant an either-or scenario. It is a lot of work, which is why teachers should be given more time to complete them, but both are important to showing mastery of necessary content.

LETRS is time consuming but essential information for everyone teaching reading. We are fairly compensated for our time. This is completely irrelevant to the question about micro credentialing.

ATF's Comments

As the leadership team of the Albuquerque Teachers Federation analyzed these responses, many questions about micro-credentials and the future of the "leveling up" process emerged:

1. If there is a writing component, who will evaluate it?
2. What is the accountability/criteria for understanding the content of the course?
3. Is a physical class an option to differentiate for adult learners?
4. Is the content of the courses differentiated for different teaching assignments?
5. How will the courses relate to teacher's individual practice and reflection?
6. How will this propel teachers forward as reflective practitioners in the state of New Mexico?
7. Will district evaluations continue to be a part of leveling up?
8. Who is designing the content, and what is their criteria?
9. How do the courses align to the New Mexico state competencies?
10. How will a teacher demonstrate mastery of the skill or area the course taught?
11. Are these courses research-based?
12. Has this system been used and proven to be effective at developing skilled practitioners and retaining educators?
13. What does NMPED expect the teaching cadre to look like after 5 years of implementation of this system?
14. What if a level 1 teacher "fails" or doesn't achieve a credential?

The profession of teaching is constantly evolving and we as practitioners are cognizant of the need to evolve our practices along with it. However, significant changes should not be done lightly and without meaningful stakeholder input.

We are hopeful that going forward the voices of educators will be heard, and the many diverse perspectives shared here will be taken into consideration when decisions that impact the professionals our union represents are made.