Honorable members of the Senate Education Committee:

Please consider this letter as written testimony regarding proposed language to change the licensure requirements for independent schools hosting regional Career Technical Education centers in Vermont.

I am Dr. Jason Di Giulio. I have been an educator in Vermont for 20 years, having started my career in a small, private school in the Northeast Kingdom, served in a K-12 school for 9 years in Canaan, and have served as an English instructor at Lyndon Institute (LI). LI serves as one half of the Career Technical Education (CTE) center for the St. Johnsbury Service Region, in concert with St. Johnsbury Academy. Both schools allow the students of the region to access CTE programs of study.

I am a licensed educator and administrator in Vermont. I hold endorsement in English (7-12), Career Technical Education Director, and Assistant Director for Adult Education. In my second year at LI, I was asked to serve as the Assistant Director for CTE. I was tasked with applying for a Director's endorsement, and in my case, taking some courses and an administrator's test. The test was a point of anxiety, as it evaluated my knowledge of budgets, professional development, supervision, curriculum, assessment, quality instruction, and other leadership topics. That test score, in combination with my providing evidence that I understood local, state, and federal laws related to Career Technical Education, labor, and industry and other leadership topics, showed that I met the competencies required of an administrator. I applied to the Agency of Education with my evidence and was awarded administrator's endorsement. Last year, I became the Director of CTE.

As Director of CTE at Lyndon Institute, I work with a team of eight licensed educators, a licensed Guidance Coordinator, and a licensed Work-Based Learning Coordinator, as well as a support team. In December of 2017, I emailed Ms. Debbie Price at the Agency of Education, requesting clarification of the process of attaining Apprenticeship licenses for the four of my instructors that were engaged in the CTE teacher training program at Vermont Technical College. That question led to a memorandum from the Secretary of Education clarifying that CTE teachers, even at independent schools, needed to be licensed. While private schools are free to hire endorsed or unendorsed instructors in other areas, the regulations clearly state that CTE teachers, regardless of employer or location, need to be licensed.

At LI, we have, for at least the last two directors, required our CTE teachers to engage in the Vermont Technical College teacher preparation program. LI, like our partner school, St. Johnsbury Academy, pay into a consortium of CTE centers to provide teacher training to our faculties. I have four teachers who have completed the program and hold level 1 or 2 licenses in their career cluster, and four more engaged in the process of earning their endorsements – most with a few semesters remaining. I have seen the effects of this training on their practice.

The Praxis test, required for license, can be a hurdle. One of my teachers has struggled with earning passing scores on the writing and math sections of the exam. I have sent the teacher to classes at White Mountains Community College and the Community College of Vermont, as well as helped arrange peer tutoring sessions, to help the teacher practice the basic skills the Praxis requires. There has been much discussion about the value or need for the Praxis test, including some literature that suggests that the Praxis may have embedded cultural biases. Some have proposed that the Praxis could be disconnected

from licensure, or that the already established alternate tests could be expanded for licensure. Those discussions, however, seem separate and distinct from the proposed language of the current CTE licensure discussion.

The language proposed, that CTE teachers at the two independent schools that have CTE centers "shall not be required to obtain a professional educator license to provide instruction in that career technical center, if the approved independent school has adopted a school-based teacher quality and performance measurement program approved by the New England Association of Schools and Colleges" seems problematic.

First, the assumption this language makes regarding the NEASC teacher quality and performance measurement program and its equivalency to teacher licensure seems erroneous. While the NEASC system sounds reasonable, as it expects independent schools to promote quality teaching, through reflection, observation, portfolio-building, observation and feedback sessions, it appears to echo many teacher mentoring programs active in Vermont schools. This could have value, as it aids teachers and schools with providing relevant learning experiences. This would seem to improve teaching, but the multi-year process does not seem to address basic teacher competencies. Licensure, however, ensures that would-be instructors meet the core requirements of Vermont educators.

Licensed teachers in Vermont must prove that they are proficient in the areas of learner development, learning differences and learning environments, have knowledge of their content area and its application, professional learning, ethical Practice, leadership, and collaboration, planning for instruction and instructional strategies, and assessment of student learning. While a license does not ensure that a teacher will be a good one, it does ensure that the community, and all stakeholders, can hold the teacher accountable for knowing and using processes related to these proficiencies. The NEASC process seems similar to other mentoring processes, and would be a value-added element to licensure, rather than a replacement for earning licensure.

I served on the commission that helped draft the Education Quality Standards in Vermont. I believe that Career Technical Education is about, among it's other missions, equity. This language could impact equal access for Vermont students to quality CTE programming.

Every CTE program, state-wide, and including those at the two independent schools that host CTE programs, are required to have a valid program of study. That program of study requires a spectrum of learning experiences that link middle, secondary, and post-secondary learning in a career pathway context. It ensures that the program is led by a qualified instructor, and that all public money is spent appropriately. Removing the requirement that instructors be licensed may impact program quality, as CTE teachers need to be both subject-matter experts and qualified educators (a similar process to other subjects being experts in their academic field, but also trained teachers). Each of my teachers was an expert in their field. They earned their teaching credential and ensured that they were proficient in learning, child development, and the other core competencies of a Vermont Educator. I have a master automotive technician on my team, for instance. When he came to the school, he definitely knew his career and the technical and professional aspects of it. He could teach adults at Vermont Technical College. He went to the VTC program, and now I see him organizing learning experiences for students, understanding the special populations that require accommodation in order to access his curriculum, and he understands the differences in teaching students, rather than just adults.

Special populations could be another point of concern with the proposed language. A licensed educator in Vermont is proficient in the construction of learning experiences, and learning environments that respect the diversity of learning needs in the classrooms and lab/shops of our centers. Some of my CTE courses have a 50% attendance rate of IEP and 504 students. The needs of those students, and also of the gender equity and other populations, require an instructor with at least basic familiarity with the issues and interventions involved in education. To remove the need for at least a basic level of proficiency with the education of special populations could be problematic.

In deliberation of this language I have heard many things. First, that if someone is qualified to teach adults, they should be qualified to teach secondary students. This is a false equivalency. I teach at the Community College of Vermont and White Mountains Community College. I know what the qualifications for post-secondary teaching are, and how the needs of students at each level differ. I propose that secondary teachers must understand child development, learning preferences, and other issues to hold a place of special trust and responsibility in our schools. Post-secondary teaching, however, requires subject-matter expertise. One does not need a teaching license to teach college or adults.

I have also heard that this language is being presented as an alternate path to licensure. Some of have argued that licensure is more difficult for CTE teachers than other teachers. This would seem to be inaccurate. All teachers, regardless of subject or career area, must demonstrate proficiency in the core teaching standards, as well as the content of their subject or career area. Again, I serve with 8 CTE teachers. Four of them hold current level 1 or 2 licenses. Four are operating with Apprenticeship licenses as they go through their VTC courses. Praxis may be problematic for some, but it seems to be workable with institutional focus and professional development courses. Expanding the Praxis alternatives may be of value, but that seems to be a different discussion.

The Education Quality Standards and the licensing of educators are a vision for equity and quality for Vermont. There should not be an exception for those students who happen to live in the St. Johnsbury Service Region. Either we, as a state, believe in the Education Quality Standards, or we do not.

Thank you for your time;

Jason Di Giulio, Ed. D.