



Minnesota Teacher Licensure

Minnesota's teacher-licensure system is broken and needs significant changes.

Key Facts and Findings:

- In Minnesota, two state agencies—the Board of Teaching (BoT) and the Minnesota Department of Education (MDE)—share responsibility for licensing teachers. In general, BoT establishes requirements for teacher licensure, and MDE reviews license applications, makes licensure decisions, and issues teaching licenses.
- Minnesota's structure for licensing teachers is confusing, which makes it difficult to hold BoT or MDE accountable for licensing decisions. Statutes blur the lines of responsibility and accountability between BoT and MDE.
- Since 2011, the Legislature has annually made multiple changes to teacher-licensure laws.
- Statutes use undefined terms or use the same term to identify different types of teacher licenses.
- The constantly changing and poorly defined teacher-licensure laws make it difficult for BoT board members, MDE licensing specialists, and teacher candidates to understand Minnesota's teacher-licensure requirements.
- Multiple exceptions to licensure requirements have led to loopholes and meaningless standards.
- As a result of actions taken by the 2015 Legislature, Minnesota's licensure requirements are now more rigorous for candidates attending Minnesota teacher-preparation

programs than for candidates trained and licensed in other states.

- In many cases, MDE has not provided teacher candidates sufficient information about why it denied licensure applications.
- The process BoT requires candidates to follow when appealing licensure decisions is not consistent with the law.

Key Recommendations:

- The Legislature should consolidate all teacher-licensure activities into one state entity.
- If nothing else, the Legislature should clarify in statute whether BoT or MDE is responsible for the various teacher-licensure activities.
- The Legislature should clarify Minnesota statutes regarding teacher-licensure requirements.
- The Legislature should restructure the state's teacher-licensure system to ensure consistency and transparency; we recommend the Legislature consider establishing a tiered-licensure system.
- In its licensure denial letters, MDE should specifically state the deficiencies it identified in an applicant's preparation or qualifications.
- BoT should ensure that its licensure-appeal process is consistent with the law.

Report Summary

During the 2013-2014 school year, more than 58,000 teachers taught in Minnesota public schools. In general, teachers must hold a valid Minnesota teaching license to teach in a public school.¹ In Minnesota, the Board of Teaching (BoT) and Minnesota Department of Education (MDE) share responsibility for teacher licensure. BoT establishes standards for teacher preparation and licensure, and disciplines licensed teachers who violate the teachers' code of ethics. MDE reviews applications, decides whether an applicant is qualified to receive a license, and issues teacher licenses.

There are serious concerns about teacher shortages in Minnesota. While there are many causes for the teacher shortage, legislators and others have identified teacher licensure as a contributing factor. Minnesota's complex and frequently changing licensure requirements further complicate finding appropriately licensed teachers.

MDE issues different types of licenses depending on the extent to which applicants have met licensure requirements outlined in law.

To receive a five-year full professional license, which is the highest "level" of teaching license available in Minnesota, teacher candidates trained in the state must complete a BoT-approved teacher-preparation program. Each program must embed certain requirements, such as (1) 12 weeks of student teaching within the field(s) and grade level(s) in which the candidate is seeking licensure; and (2) courses on reading strategies, technology strategies, and working with diverse learners. Teacher candidates must also pass skills and pedagogy exams, and field-specific exams related to the content they wish to teach.

MDE may issue a "temporary" license to teacher candidates who meet some but not

all licensure requirements. A temporary license allows candidates to teach while they work toward meeting the requirements. Depending on the candidates' qualifications, MDE may renew these one-year licenses up to three times to give candidates additional time to satisfy the requirements.

Based on school district or charter school request, BoT may issue candidates "special permissions." These permissions allow individuals to teach in a classroom without meeting all licensure requirements. Some special permissions allow *licensed* teachers to work outside of their licensed field. One type of special permission—the nonlicensed community expert permission—allows school districts and charter schools to hire *unlicensed* individuals to teach in a classroom. In most cases, BoT must approve special permission requests.

Minnesota's licensure requirements for teacher candidates trained outside of the state are now lower than for candidates trained in Minnesota.

The 2015 Legislature changed licensure requirements for teacher candidates trained outside of Minnesota. MDE can now license candidates trained and licensed in another state without evidence of reading instruction or technology strategies, among other things. In contrast to candidates trained in Minnesota, candidates from other states must show field-specific methods training *or* student teaching, *or* two years of experience. Additionally, student teaching experience of five days (as compared with the 12 weeks required of Minnesota-trained candidates) is sufficient.

MDE does not provide sufficient information about why it denies license applications, and BoT's appeal process is not consistent with law.

When MDE denies a teaching license to an applicant, its practice is to notify the candidate in a letter explaining the reasoning for the decision, options the candidate can pursue, and the candidate's right to appeal the decision.

¹ *Minnesota Statutes* 2015, 120A.22, subd. 10. *Minnesota Statutes* 2015, 122A.25 and 122A.30, identify some exceptions to this requirement.

We reviewed 100 application files, including the files of 31 candidates for whom MDE fully or partially denied licensure. Based on our review, 14 of these candidates received no letter explaining (1) why MDE denied them licenses or (2) that they had a right to appeal the decision. Among those who did receive a letter, we found MDE's reasoning unclear in a majority of cases. We recommend that MDE provide candidates a specific explanation as to why it denied a license application.

Applicants can challenge their licensing denial by appealing to BoT. However, BoT requires candidates to submit two written requests for appeal, rather than the one written request required by law. We recommend that BoT ensure that its licensure-appeal process aligns with the law.

Frequent changes to teacher-licensure requirements have made it difficult for applicants to know what Minnesota requires for a license.

In each of the past four legislative sessions, the Legislature has changed the law related to the skills exam that candidates must pass to receive a five-year full professional teaching license. The Legislature has also regularly added new requirements that board-approved teacher-preparation programs must include in their curricula. These frequent changes can impact teacher candidates. For example, one teacher candidate attended a Minnesota preparation program from 2007 to 2012 but did not successfully pass her licensure exams until 2015. When she applied for a five-year full professional license in 2015, the training she had completed—which met 2007 licensure standards—did not meet the 2015 standards. As a result, MDE denied the candidate the five-year license and advised her to take the necessary courses to meet current requirements.

In recent years, the Legislature has also established a number of exceptions to its licensure requirements. For example, candidates have at least four years to pass the required licensure exams, during which time MDE issues them a temporary license that allows them to teach in a

Minnesota classroom. Similarly, special permissions allow candidates who do not meet licensure requirements to teach in a classroom, subject to board approval.

Teacher-licensure statutes use undefined and unclear terms, which makes licensure requirements difficult to understand.

Depending on an applicant's qualifications, statutes require BoT or MDE to issue a "teaching license," "standard license," or "initial license." However, neither statute nor rule defines any of these license types. As a result, it is not clear what type of license a candidate should receive based on these sections of law.

Additionally, one license type—a "restricted license"—has two different statutory meanings. One type of restricted license permits a candidate who is licensed in another state to be granted a license with a narrowed grade-level or content scope. For example, rather than receiving a license to teach Spanish in kindergarten through grade 12 (the typical Minnesota Spanish teaching license), a candidate licensed in another state to teach Spanish in grades 7 through 12 could receive a "restricted" Minnesota license to teach only secondary Spanish.

Statutes also permit MDE to grant a "restricted license" to a candidate who has completed all licensure requirements except for passing the skills exam. MDE issues this license at the request of the school district in which the candidate is currently teaching; the license is restricted to the subject area, grade level, and school in which the candidate is currently teaching.

The poorly defined terms, exceptions, and frequent changes in law make Minnesota's teacher-licensure system complex and confusing.

In response to our survey, BoT board members told us that current teacher-licensure laws are "ambiguous and difficult to navigate," "unclear," and "confusing and counterproductive." One board member noted that teacher-licensure statutes change

regularly, which makes the laws that much more difficult to understand.

Similarly, MDE licensing specialists—the people who review applicants’ qualifications and issue the licenses—are also occasionally confused by the frequently changing teacher-licensure laws. For example, MDE staff did not fully understand changes made by the 2015 Legislature that extended the number of years candidates have to pass the required licensure exams.

Finally, many applicants are confused about Minnesota’s licensure requirements. As part of our evaluation, we surveyed licensure applicants who were trained or licensed in another state and who applied online for their first Minnesota teaching license in fiscal year 2015. Several respondents commented that the requirements to obtain a license are not clear. As one respondent said, “you need a firm understanding of Minnesota education laws to know how to apply and what is needed.”

We recommend that at the very least, the Legislature clarify statutes regarding teacher-licensure requirements. While these changes will help, we think larger changes need to be made. Therefore, we also recommend an overhaul of the licensure system. We suggest the Legislature consider a tiered-licensing system that provides transparency, consistency, and flexibility.

Having two state entities responsible for teacher licensure is confusing and results in diminished accountability.

Stakeholders who regularly deal with the department and board often do not know which entity to contact with questions regarding teacher licensure. They told us that the structure is “confusing,” “frustrating,” and “complicated”; that “accountability is diffused”; and there is a lot of “finger pointing.” In interviews, a longtime administrator told us that he could not define which entity does what task regarding teacher licensure, and that he typically contacts both BoT and MDE with any questions. Referring to the licensure structure, a school board member said, “There is a lot of mystery to it.” MDE staff acknowledged that the public generally does not understand the difference between MDE and BoT.

The lack of transparency regarding which organization is responsible for a given task results in less accountability. If school administrators and license applicants do not know which state organization is making licensing decisions, it is difficult to hold the responsible organization accountable. We recommend that the Legislature consolidate all teacher-licensure activities into one state entity, and we think it makes the most sense to have BoT be the entity responsible for teacher licensure in Minnesota.

Summary of Agencies’ Responses

In letters dated February 24, 2016, Department of Education Commissioner Brenda Cassellius, Board of Teaching Executive Director Erin Doan, and Board Chair John Bellingham agreed with the report’s key findings and recommendations. Commissioner Cassellius wrote, “The current teacher licensure system is too complex,” and that the department “encourage[s] the Legislature to simplify the laws and make the system more transparent....” Similarly, Ms. Doan and Mr. Bellingham wrote, “statute and rule are not aligned and currently cloud the understanding of licensure expectations.” Both agencies also agreed with OLA’s recommendation to consolidate teacher-licensure activities in one state agency. Commissioner Cassellius wrote, “We believe that consolidating all activities under one state entity will make it more transparent and understandable to the public.” Likewise, Ms. Doan and Mr. Bellingham wrote, “Members support the recommendation for consolidation of all licensing activities into the work of the Board of Teaching.”

The full evaluation report, *Minnesota Teacher Licensure*, is available at 651-296-4708 or:
www.auditor.leg.state.mn.us/ped/2016/teachers.htm