



STATE OF MAINE
DEPARTMENT OF EDUCATION
23 STATE HOUSE STATION
AUGUSTA, ME 04333-0023

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March 11, 2025

Senator Rafferty, Senate Chair
Representative Murphy, House Chair
Members of the Joint Standing Committee on Education and Cultural Affairs

Senator Rafferty, Representative Murphy, and Distinguished Members of the Education and Cultural Affairs Committee:

LD 369, An Act to Grant or Extend Conditional Teaching Certificates Under Certain Circumstances allows the Commissioner of Education to grant an extension of a conditional teaching certificate in the case of extenuating circumstances. The request for an extension must be accompanied by supporting documentation of the circumstances. The bill also allows the Commissioner to issue a conditional certificate to an individual who has been employed as a full-time professor at a college or university in the State for at least 5 years and prohibits the Commissioner of Public Safety from assessing a fee for fingerprinting such an applicant.

Identifying additional pathways to certification is a perennial topic of interest. The Department appreciates the efforts of the sponsor to identify ways to increase the number of school staff available. However, the State Board of Education's rule for certification, Rule Chapter 115 is currently under revision and the Board's proposed update to the rule is slated to reach this legislature during the second regular session.

The Department of Education would like to highlight two primary concerns with the proposed language of this bill. First, the bill does not require pedagogical training for those full-time professors seeking a credential through this new pathway. The second area of concern relates to the limitations of certification software and the understandably complex interaction between the Maine DOE's Maine Educator Information System (MEIS) for certification and the State Bureau of Investigation's (SBI) criminal history records check (CHRC) system.

The proposed language establishes no requirement for an individual to apply for certification in an area related to their expertise or employment. For example, someone employed as a professor of nuclear engineering would be able to earn a three-year credential to teach French without any indication that they are fluent in that language. Even if there were a requirement in this provision to match a professor's subject matter to their conditional certification, it is not typical for professors in most fields of study to receive specific instruction in teaching methodologies or human development. While it may be reasonable to assume there are transferable skills between teaching a college course and teaching high schoolers, research suggests teachers are more effective (and their students have better outcomes) when the teacher has been specifically trained in teaching methods. The gap in transferable skills between a college classroom and a PreK-12 classroom becomes even more pronounced when considering settings with younger students and students with exceptionalities.

When looking at special education as a possible certification area, this concern is further compounded by the federal US ED's requirements for state regulations concerning special education certification. Under State Board of Education Rule Chapter 115, Part II, a conditional certification in 282 Teacher of Students with Disabilities is only available to those who have enrolled in an approved mentorship program; this provision ensures the state meets the federal requirements of 34 CFR 300.156(c)(2)(i)(A), established by the Individuals with Disabilities Education Act (IDEA).


It is also likely that professors applying for a credential have already met the requirements for a conditional certification in secondary education in the subject area of their expertise. Anyone with at least a bachelor's degree and at least 24 credit hours of learning in a particular subject already qualifies for a conditional certification in secondary education for that subject area. It would be difficult to imagine an experienced professor who has not taken 24 credit hours of coursework in their field of study; that threshold could be further lowered by 6 credits given the professor's teaching experience. The vast majority of applicants for whom Section 3 would be useful can already qualify for conditional certification without the proposed change to statute.

Should this bill progress, there are concerns related to the existing system that must be considered. To issue a conditional certification, as outlined in Section 3 of the bill, the certification team would need to collect educator data related to certification applications in a slightly different way. Currently, all applicants for teaching certification apply using the same process, and upon evaluating an application, the certification team determines the most direct pathway for the educator to qualify for a credential. Because applicants pay for fingerprinting separately and concurrently with their DOE application processing, it presents a significant challenge to accurately identify the educators whose fees would need to be waived. To implement the new conditional certification pathway outlined in this bill, the existing system would require modifications and additional coding in the MEIS, which is billed by the state's software vendor at a rate of \$125/hour. The fiscal note on LD 753 during the 131st Legislature, which built a new pathway for retired teachers to re-obtain their former credential, amounted to \$10,000 for an estimated 80 hours of work from the vendor. The complication of routing these applicants to a different, pre-set conditional certification path and waiving their fingerprinting fees would mean that the \$10,000 estimate would be a low water mark. It may be more reasonable to assume that these coding updates could cost 150% to 200% of that figure.

While mindful of these complications regarding this particular piece of legislation, the Maine Department of Education (DOE) remains supportive of innovative strategies to encourage highly trained professionals to enter the field of teaching, including efforts to bridge qualified educators into PreK-12 classrooms in our state.

The Maine DOE can be available for a work session on L.D. 369, An Act to Grant or Extend Conditional Teaching Certificates Under Certain Circumstances.

Sincerely,

DocuSigned by:

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Michael Perry

Director of Higher Education and Educator Support Services

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