



February 24, 2026

LD 2175 Public Testimony, Neither For Nor Against  
Changes to State Board of Education Rule Chapter 115  
Submitted by Amy Johnson, Cathie Fallona and Janet Fairman (MEPRI)

Dear Sen. Rafferty, Rep. Murphy, and Esteemed Members of the Committee,

In recent years, the Maine Education Policy Research Institute (MEPRI) has prepared several reports for the legislature describing the challenges of recruiting, preparing, and retaining Maine's educator workforce, and summarizing the evidence base for educator credentialing systems. Here, we will attempt to connect several findings from across these studies that relate to the proposed changes to teacher certification in Rule Chapter 115. The full reports are available at <http://mepri.maine.edu>.

### **Portfolios**

The changes in Part I, Section 6.2 add a much needed competency-based pathway to certification. MEPRI has advocated for such flexibility, particularly for individuals employed in school settings while preparing to become teachers through "grow your own" pathways. While it may be argued that the alternative pathways to certification outlined in Rule Chapter 114 (Purpose, Standards and Procedures for the Review and Approval of Educational Personnel Preparation Programs) have already afforded the ability to create such programs, the new language in Chapter 115 makes this explicit. We are hopeful that this will spur new high-quality preparation opportunities.

MEPRI offered public comment about section 6.2 of the proposed rule last fall, and the substance of our concerns was addressed in the final version. We suggest a few further changes for clarity:

- Rule Chapter 114 should be amended to delineate how the State Board of Education will review portfolio processes as specified in Section 6.2.B (5)(A). This should be directed in LD 2175, such as through unallocated language.
- Institutions of higher education should also be encouraged to create competency-based preparation pathways, not just districts, regions, or consortia. This can be made more explicit by adding "institutions" to Section 6.2.B (5)(D).
- The changes to Part I, Section 6.2 that were made in the final version of the rule have clarified that portfolio processes are approved pathways. This means that the "Pathway 3" that has been added throughout the endorsement requirements in Part II are no

longer needed, since portfolios are included in Pathway 1 language references to “Section 6.2.”

### **Transcript Analysis**

A remaining challenge to the revised rules is that Pathway 2, the transcript analysis review process, still does not align conceptually to Rule Chapter 114. Multiple pathways to teacher preparation should all be based on the same expectations, built from sound evidence about the skills and dispositions needed for effective teaching. However, Pathway 2 transcript analysis requirements have not undergone formal review based on the Ch 114 standards, and there is no mechanism outlined in Ch 115 Part 1 or Part 2 for ensuring that Pathway 2 is equivalent.

The current Pathway 2 (transcript analysis) courses are deemed by many teacher educators as inadequate to prepare teacher candidates for all of the initial teaching standards in Chapter 114. Namely, for most endorsements, the courses detailed in Ch 115 Part 2 do not customarily address classroom management, curriculum planning, and student assessment at the level expected of Maine’s approved programs. While adding a portfolio option to Pathway 1 that assesses all of these skills is an improvement, the transcript analysis pathways must also be aligned with Maine’s teaching standards to ensure all teacher candidates are held to similar expectations.

Individuals preparing to teach while employed under conditional or emergency certificates can now avail themselves of portfolio options through Pathway 1. However, Pathway 2 remains an important tool for individuals moving to Maine with a credential and not otherwise eligible for reciprocity (i.e. they did not complete a CAEP-approved program and are not in a shortage area). These individuals will have completed student teaching. Pathway 2 also supports teachers who seek to add additional endorsement areas to an existing Maine certificate. We therefore suggest the following amendment made throughout the Pathway 2 language in Part II:

“(X) Completed one academic semester or a minimum of 15 weeks of full-time student teaching, or a combination of part-time and full-time student teaching in an amount equivalent to 15 weeks in this endorsement area at the specified grade level. This requirement shall be waived ~~upon completion of one full year of successful teaching under a conditional certificate in this endorsement area for the specified grade level.~~ for individuals holding a professional teacher certificate in another endorsement area.”

We can be available at the LD 2175 work session upon request to address questions about the evidence basis for teacher preparation and credentialing systems.