

DATE: Feb 24, 2026
TO: Committee on Education & Cultural Affairs
RE: **LD 2175 Resolve, Regarding Legislative Review of Portions of Chapter 115: The Credentialing of Education Personnel, a Major Substantive Rule of the Department of Education**

Senator Rafferty, Representative Murphy and distinguished members of the Joint Standing Committee on Education & Cultural Affairs:

We are writing to you today to oppose LD 2175 as currently written.

We are Professors and Chairs of the Teacher Education Department at the University of Southern Maine and University of Maine Augusta. We speak as citizens and not on behalf of the Universities or the University of Maine System or any organization to which we belong. We have been professionally involved as professors and researchers in teacher education for over 30 years in traditional, alternative, and innovative programs.

Chapter 115 The Credentialing of Educational Personnel has been under review and revision with extensive public input for many years. Our focus is on the addition of a Pathway 3 to initial teacher certification as outlined in Part 1 Section 6.2.B for initial teacher certification. Section 6.2.B (4) states that professional certification may be obtained through

Successful review of a portfolio demonstrating competency in standards for pre-service candidates or in-service teacher, administrator or educational specialist as described in State Board of Education Rule Chapter 114.

The proposed language continues in Part 1 Section 6.2.B (5) to describe that the Department will verify portfolios developed on a case-by-case basis and that 6.2.B (5) A

A) The district's, region's or consortium's process for developing such portfolios must be approved in advance by the State Board of Education, resulting in preparation at least equivalent to a novice teacher's preparation through a traditional program.

It is unclear whether 6.2.B (4) and 6.2.B (5) are the same process or different processes. It appears that the Department approves individual portfolios following a locally developed process approved by the State Board of Education.

We are concerned about the lack of clarity regarding the portfolio requirements and the capacity of the certification office to be able to review these portfolios without significant additional hiring and training. Currently, there are many documented challenges with certification because of staffing and capacity issues. The review of portfolios is a tremendous workload challenge and requires a level of professional expertise for the multiple areas of certification being addressed by this proposal.

The portfolio option came about from concerted advocacy efforts from superintendents to address the educator shortage. Promotion from the MEA and others have focused on examples of additional endorsements and certifications for in-service teachers, administrators or educational specialists. Presumably in-service educators have experience and some level of preparation. Pre-service candidates by definition, have neither experience nor preparation which are so highly needed for educational professionals in these complex and demanding environments. With the pathways for conditional certification, there are already many opportunities for school administrators to hire minimally qualified educators who are working towards their certifications.

We urge you to require significant clarifications of the expectations for the portfolios and additional staffing and training to meet the demands of reviewing the portfolios. At the very least, strike pre-service from the language as initial educator preparation does require all of the elements for experience and competency articulated in Chapter 114 Purpose, Standards and Procedures for the Review and Approval of Educational Personnel Preparation Programs.

Sincerely,

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Leigh Reagan Alley, Ed.D.

Cynthia D. Dean, Ed.D.

Timothy N. Surette, Ed.D.