

To: The Vermont Standards Board of Professional Educators
From: The Vermont Council of Special Education Administrators (VCSEA)
The Vermont Higher Education Collaborative (VT-HEC)
The Vermont National Teachers Association (VT-NEA)
The Vermont Principals Association (VPA)
The Vermont Superintendents Association (VSA)
The Vermont School Boards Association (VSBA)

Date: January 16, 2024

Re: Provisional Licensure for Special Educators in Vermont

In every endorsement area but special education, provisionally licensed Vermont educators are provided three years to complete requirements for full licensure. We strongly urge you to extend this option for provisionally licensed special educators in Vermont.

The U.S. Office of Special Education and Rehabilitative Services recognized the importance of extended time in its October 22, 2022 memo to State Directors of Special Education. Under 34 C.F.R. § 300.156(c)(2), provisionally licensed special educators may “(3) assume the functions as a teacher only for a specified period of time not to exceed three years” (p. 2).

The current VT 2 year provisional license for special educators is problematic for many reasons:

- It contributes to unprecedented shortages that leave Vermont’s most vulnerable learners underserved.
- It creates unnecessary barriers for individuals completing coursework and other requirements while simultaneously working in one of the most difficult and demanding positions within a school. It is important to note that the last 3 years have been particularly challenging following the emergency school closures in March 2020. Schools across the state are seeing an increase in more challenging student behavior, coupled with more requests for special education evaluations.
- Many special educators on provisional licenses choose to enroll in programs such as the Vermont Higher Education Collaborative (VT-HEC) to become fully licensed. Students are required to complete 24 graduate credits in special education, two years of seminars in the Core Teaching Standards, a year long internship, and the Vermont Licensure Portfolio. This is a daunting task in itself without the added stress of a new position within the school.
- Individuals who do not have an undergraduate degree in education need to go through pathway (d) through the VT AOE. These individuals are required to complete the Praxis II in special education along with additional VT AOE requirements for the special education provisional license. That includes webinar modules and the state Peer Review Process.
- Special Educators on provisionals who are hired mid school year do not have the full 2 years to complete all the requirements. The academic year is considered year 1 for the provisional license. When this happens the special educator is not able to complete the course sequence and licensure requirements within 2 years in programs such as the VT-HEC. These individuals are being asked to complete a two year program in one year, while facing all the challenges of the new position.

In Fall 2023 alone, five students (almost 10% of VT-HEC’s newest special educator cohort) have dropped out for reasons related to stress from the rigor of the program coupled with the demands of the position.

It is critical that special educators on provisional licenses be given the time to successfully complete the preparation necessary to serve our most vulnerable students. This is the only way we as a state will be able to attract and retain new special education teachers. Allowing candidates to hold provisional licenses for three years would enable them to **complete the requirements for full licensure at a reasonable pace**. It would also help those who are hired partway into a school year. While they would still only have two years, they would not have to double up coursework.

We ask that you reconsider the current VT policy in the interests of both provisionally licensed special educators and learners in classrooms across Vermont, and allow 3 years for a provisional license as provided by the Office of Special Education Programs (OSEP) October 22, 2022 memo.

cc: Secretary Heather Bouchey, VT Agency of Education
Ron Ryan, VT Agency of Education Licensing Department