



February 23, 2024

The Honorable Brian Feldman, Chair  
Senate Education, Energy & Environment Committee  
2 West, Miller Senate Office Building  
Annapolis, MD 21401

Re: **SB 771/HB 945 – Letter of Information**

Dear Chairman Feldman, Vice Chair Kagan and Members of the Committee:

Thank you for providing ETS with the opportunity to inform SB 771/HB 945. ETS is the world's largest educational measurement, data, and research organization operating in 200 countries and has a legacy of more than 75 years in helping governments address key challenges in education through ground-breaking innovative educational assessments. ETS's teacher licensure assessments are recognized in 40 states and we are also well known for our K-12 assessments. Globally, our GRE®, TOEFL®, and TOEIC® tests are used for university admissions and in the workplace. We have also directly assisted many governments, organizations, and associations around the world to meet their K-12, higher education and teacher licensure and other workforce assessment needs. Our 75-years of experience and widely recognized innovative and industry-leading practices, ensure that our tests are fair, reliable, and a valid measure of the content being tested. Using these scientifically backed methods, our assessments provide assurance that a professional has at least the baseline knowledge necessary for beginning practice in their profession.

This is especially critical when it comes to the profession of teaching. Teacher licensure assessments are a critical measure and control to ensure that, *at the very least*, a minimally qualified educator is placed in a classroom. The score adopted for each content area represents what a "just qualified" (i.e., minimally qualified candidate) should know for safe and effective practice. Educator testing has been considered a necessary and powerful measure to ensure that all children have access to qualified educators.

Given ETS's footprint in the states, ETS has a bird's eye view of licensure across the country. In almost all states, candidates for licensed educator roles are statutorily required to pass a series of tests before they obtain a license. The requirements vary by state, but almost all use some combination of assessments to ensure that candidates have the necessary skills needed to teach, including a functional level of understanding of the content knowledge. As research reflects, students who are assigned to teachers with higher mastery of their content, as measured by licensure tests, perform better on standardized assessments. ([Clotfelter et al., 2007, 2010](#); [Cowan et al., 2023](#); [Goldhaber, 2007](#)).



To inform debate of the bill, the following relevant information should be considered:

Definitions:

**Basic Skills Assessment:** These tests measure academic skills in reading, writing and mathematics. They are designed to comprehensively measure the skills and knowledge deemed essential for candidates entering teacher preparation programs or as a certification requirement.

ETS's basic skills assessment is the Praxis CORE assessment which measures skills in reading, writing and math. Maryland uses the Praxis CORE assessment as one of multiple options to meet Maryland's Basic Skills Assessment Requirement needed for certification. It is important to note that currently, teacher candidates who submit a minimum overall GPA of 3.0 on their most recently earned degree are not required to submit a basic skills assessment unless enrolled in a Resident Teacher Certificate program. The following website includes a list of additional options for teacher candidates to meet the Basic Skills Assessment Requirement:

[https://www.marylandpublicschools.org/about/Pages/DEE/Certification/testing\\_info/praxis1.a.spx](https://www.marylandpublicschools.org/about/Pages/DEE/Certification/testing_info/praxis1.a.spx)

**MA Communication and Literacy Skills Assessment:** The Massachusetts Communications and Literacy Skills Test (CLST) is a test of basic literacy skills required of all candidates for licensure in Massachusetts. It is a two-part test that covers reading comprehension and writing proficiency that is required for all educator licenses. It is not used for program entry but is a requirement for licensure. (Most states use a basic skills assessment that cover reading, writing and math. The Massachusetts assessment does not cover math).

**Subject Specific Assessments:** One of the critical attributes for beginning teachers is to understand the content area in which they teach. Subject tests measure subject-specific content knowledge, as well as general and subject-specific teaching skills, that K–12 educators need for beginning teaching in the content area in which they are teaching. They include over 90 different tests ranging from Agriculture to World Languages. Maryland currently uses the Praxis Subject Assessments for this purpose. More information can be found [here](#).

**Portfolio-Based Assessments:** In addition to content knowledge, another critical attribute of beginning teachers is performance, which is the ability to apply their knowledge in the classroom to promote student learning. A portfolio-based assessment, also known as performance assessment, measures how students apply content knowledge and teaching skills in the classroom and evaluates their ability to impact student learning through submitting tasks and artifacts based on classroom activities. These assessments are usually completed prior to graduating from an educator preparation program. Maryland has approved the Praxis Performance Assessment for Teachers (PPAT®) and edTPA for this purpose.

**Reading Assessment:** In recent years, many states have added a reading assessment requirement to ensure teachers are prepared in the science of reading. Maryland's requirement went into effect in 2019 and the Praxis Teaching Reading: Elementary (5205) test is utilized for the following certification areas:

- Early Childhood
- Elementary Education



- English to Speakers of Other Languages
- Special Education
- Reading

### **Massachusetts Policy Changes**

Recent policy changes in Massachusetts may be relevant to note when considering this legislation. In 2020, the Massachusetts Board of Elementary and Secondary Education (BESE) authorized the Massachusetts Test for Educator Licensure (MTEL) [alternatives pilot](#) to study different methods for demonstrating communications and literacy skills and content knowledge. The alternative assessments are intended to increase accessibility for strong educators while maintaining standards for teacher knowledge. One of the alternatives offered was the Praxis CORE, which Maryland currently uses as one of the options for the basic skills assessment requirement. The [study](#) of the pilot found no significant difference in performance with candidates using a variety of measures for basic skills.

### **Comments and Areas Needing Clarity**

ETS recommends that the proposed legislation be clarified as follows:

*Current legislative language:*

- (1) *The Department shall determine whether the Basic Literacy Skills test [required] APPROVED for initial teacher certification is at least as rigorous as the similar examination administered by the Commonwealth of Massachusetts. (See Page 2, Lines 22-24)*

*Comment:*

In light of the changes Massachusetts has been considering related to their licensure assessments, Maryland should reconsider if this is the most appropriate comparison. In addition, the Massachusetts Basic Literacy Skills test does not measure mathematics skills, which is becoming more of a focus for Maryland and across the nation.

*Current legislative language:*

- (II) *MEET ONE OF THE FOLLOWING QUALIFICATIONS: 25 1. Subject to paragraph (3) of this subsection, pass a nationally recognized, portfolio–based assessment of teaching ability; 2. PASS A BASIC SKILLS ASSESSMENT; 3. HOLD A DEGREE FROM A REGIONALLY ACCREDITED EDUCATIONAL INSTITUTION AND HAVE EARNED A MINIMUM OVERALL CUMULATIVE GRADE POINT AVERAGE OF 3.0 ON A 4.0 SCALE OR ITS EQUIVALENT ON THE MOST RECENTLY EARNED DEGREE; OR 4. SUBMIT DOCUMENTATION SATISFACTORY TO THE DEPARTMENT OF SATISFACTORY EVALUATIONS FROM A LOCAL SCHOOL SYSTEM. (See Page 3, Lines 22-33)*

*Comment:*

If the purpose of this requirement is to ensure a candidate's basic skills, it should be noted that a portfolio assessment generally assesses content knowledge and performance of a candidate. Clarity on the purpose of each requirement and ensuring the measures align should be considered.

*Current legislative language:*

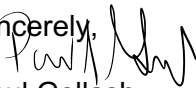
- [(ii) Pass a rigorous State–specific examination of mastery of reading instruction and content for the grade level the individual will be teaching; and] (See Page 4, Lines 6-7).*



*Comment:*

Clarify if the intention is for the state to discontinue the use of a reading assessment for certification. Maryland put this requirement in place in 2019 and while Maryland Comprehensive Assessment Program (MCAP) scores for reading are rising, only 48% of third-grade students are proficient in reading. Most states are adding requirements to ensure their teachers are well-prepared to teach reading. This “Science of Reading” concept was strongly supported by Maryland Interim State Superintendent Carey Wright when she was Superintendent in Mississippi and it resulted in greatly increased results in reading proficiency, so it is surprising that Maryland would want to eliminate this requirement at this time.

ETS appreciates your consideration of our comments and looks forward to continuing our strong partnership with Maryland to improve teaching quality. We would be happy to respond to any questions and meet with any members who have additional questions about high quality licensure systems and how other states are addressing challenges in this space.

Sincerely,  


Paul Gollash  
Vice President, K-12 & Praxis