

October 23, 2020

Missouri State Board of Education  
c/o Missouri Department of Elementary and Secondary Education  
P.O. Box 480  
Jefferson City, MO 65102-0480

Dear Members of the Board:

The Missouri National Education Association believes every student deserves a caring and qualified teacher in a well-resourced classroom. Teachers, permanent or substitute, are college-educated professionals who work on perfecting their craft in the interest of helping students succeed.

As educators, we know every interaction with students can leave a lasting impact. We also know that one day with a poorly qualified substitute can prove disastrous, especially in a time when students are experiencing trauma and stress. A qualified and knowledgeable substitute teacher keeps students on track when their regular teacher is unavailable. Missouri NEA believes the **proposed lowering of standards for substitutes is not what is best for students and undermines respect for the profession of teaching.**

Missouri NEA urges the State Board of Education (SBOE) to reject the permanent rule change granting substitute licenses to individuals with less than 60 college credit hours. The alternate certification proposal falls short by requiring no commitment to academic success through advanced education beyond high school, no age minimum, and only 20 clock hours of reviewing online videos to qualify for entry into the classroom. We remain puzzled as to why the State Board of Education, known to advocate for students and teachers to meet higher standards, would agree to create one of the nation's lowest substitute certification standards. If the decision was made by the board because of an extreme emergency, why would the alternate certificate issuance extend for four years without analyzing the data related to the impact of this decision? Currently, even provisional, and temporary certificates for experienced teachers are only issued for one or two years.

As you know, Missouri's starting teacher salary is the lowest in the nation. Districts report difficulty retaining full-time teachers, and educators are experiencing overwhelming workloads because of the demands of COVID-19. Our state is asking more of teachers than ever before. Missouri NEA believes that any step towards reduced standards for substitutes is moving our state in the wrong direction and sets a precedent for lowering standards to solve personnel shortages rather than improving compensation and recruitment strategies. Instead, we hope your response will lift-up educators by maintaining high standards and work toward a long-term solution to enhance the pool of available substitutes.

**With this in mind, we hope the SBOE will consider the following actions:**

- Prior to making the rule permanent, collect and analyze data from Missouri districts over the next two years to include the following: number of substitutes employed per day, whether the substitute is utilized in elementary or secondary classrooms, daily rate of pay, positions the district was unable to fill, and whether the substitute was observed by the administration while teaching. The SBOE may consider creating a simple data collection form from the substitute teacher for the district to retain as a part of the permanent record. This may require a sunset to the rule under consideration.
- Support local school districts with a state subsidy to increase substitute pay.
- Revise the teacher certification process to allow substitute teaching to account for a portion of the required practicum and/or student teaching experience.
- Encourage school districts to offer benefits for frequent or long-term substitutes.
- Instruct Regional Professional Development Centers (RPDC) to recruit regional pools of potential full or part-time substitute teachers from which a district may begin interviews to include certified teachers in the DESE database that are not currently employed.
- RPDCs on college campuses are strategically located to broaden recruitment of substitutes from students with 60+ hours of college credit in fields other than education.

Should the SBOE proceed by lowering standards for who is permitted to instruct students, Missouri NEA advocates for the following additions to the proposed substitute certification rule:

**Transparency:** The State Board of Education should take the additional step of differentiating certificates of substitute teachers certified under the amendment to rule 5 CSR 20-400.220. Identifying substitutes granted certification under the lower standard will allow school boards, administrators, and teachers to make informed hiring decisions.

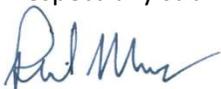
**Renewal of Certification:** Emergency substitute certifications should expire with renewal contingent upon recommendation from a school district that employed the substitute, coursework, or professional development. Administrators or certified teachers should evaluate emergency substitutes, not third-party vendors.

**Sunset and Analysis:** The rule should sunset August 30, 2023, at which time DESE should present data collected from local districts evaluating the effect of lowering the standards for substitute certifications.

The Missouri National Education Association believes school districts must build a strong substitute pool to maintain the highest standards for student learning, quality instruction, and professional practice in every classroom. Missouri students deserve a well-qualified substitute.

Thank you for your time and attention regarding this important matter. Please do not hesitate to contact me with questions or for clarification.

Respectfully submitted,



Missouri NEA President