

**Opponent Testimony for Sub. H. B. 33**  
**Senate Education Committee**  
**Mary Heather Munger, Ph.D.,**  
**President, Ohio Association of Colleges for Teacher Education**  
**Diana Garlough, Ed.D.,**  
**President, Ohio Association of Private Colleges for Teacher Education**  
**James Hannon, Ph.D.,**  
**Chair, State University Education Deans**

Chairman Brenner, Representative Edwards, and members of the Senate Education Committee, Thank you for allowing me to submit this written testimony. My name is Mary Heather Munger.

I am writing this testimony along with my colleagues, Dr. Diana Garlough and Dr. James Hannon. Currently, we serve as presidents of the Ohio Association of Colleges for Teacher Education, the Ohio Association of Private Colleges of Teacher Education (OAPCTE), and the Association of State University Education Deans (SUED) respectively. We represent all Ohio institutions of higher education that prepare teachers.

We oppose the inclusion of changes to grade band licensure that was included in Sub. H. B. 33 and proposed in Sub H. B. 9. We are advocating for the removal of the grade band licensure change indicated on pg. 1356, lines 41665-41666. The change is problematic for the following reasons:

- **It dilutes the content and pedagogical preparation for teachers across the grade level bands, resulting in weakened student learning.** PK-5 licensure provides a solid foundation in child development and preparation in instructional strategies for the youngest learners, which are significantly different from appropriate instructional strategies for middle-level learners. 4-9 licensure incorporates much more substantial content area preparation allowing for deeper content coverage and the use of grade-level appropriate strategies for students in the middle grades.
- **It risks staffing middle grades with teachers not committed to working with that population.** Before the institution of 4-9 licensure, middle grades were often assigned K-8 teachers who would have preferred to teach younger students or 7-12 teachers who would have preferred to teach in a high school. As a result, middle grades teachers ranged widely in their commitment to middle grades students, and student experiences suffered. The case for preparing educators specifically to work with middle-grade adolescents has long been championed by the Association for Middle-Level Education and is articulated in their research-supported publication *This We Believe* (2020), now in its fifth edition.
- **Implementation would be costly and time intensive.** This would not be a quick fix for educator shortage issues; it will take a minimum of four years before any teachers would be licensed under the proposed grade bands. Proposed grade-level band changes would necessitate new pedagogical standards to be developed and adopted. These standards would need to be used by educator preparation programs to modify nearly all programs through internal approval processes, including newly modified P-5 programs and dual licensure programs for which intervention specialist grade bands aligning to the current regular education grade bands have just been incorporated into code. The Ohio Department of Higher Education would need to review and approve all modified programs. The Ohio Department of Education would need to develop and

validate new licensure tests. At least 2 new pedagogical tests for the new licensure ranges and a new PK-8 content test for licensure would be needed. Also, the Ohio Department of Education would have to determine if the content tests for the current secondary licenses would need to be revised, and if so, that would be up to 8 more tests. This is a long, laborious process that requires many levels of expert review. As an example of the length of time, the single content test for the new P-5 license will be given for the first time in July this year. We only recently changed to the P-5 so have had little time to understand its impact. The first group of students to be able to obtain the P-5 license was in Spring 2020.

- **It may make the shortage situation worse.** Along with attracting new teachers to the field, we know that retaining teachers is a key factor in solving the shortage issue. Comprehensive preparation is associated with teacher retention (Sucher, Darling Hammond, & Carver Thomas, 2016). As mentioned, changing the grade bands will dilute the quality of middle-grade teachers specifically. Providing these teachers with a less comprehensive program may lead to even higher rates of attrition.

Teacher licensure is not an appropriations-related item and, therefore, should not be included in a budget bill. It should be discussed and deliberated by the appropriate education committees, educational agencies, and education specialists with the best interests of students as the primary focus.

The proposed changes will negatively impact a wide audience - elementary and middle school students, elementary and middle school teachers, future/pre-service teachers, teacher preparation programs, and accrediting bodies such as CAEP and ODHE, and will not resolve the teacher shortage. In fact, it may make it worse. Requiring a teacher to teach outside their desired developmental level may lead to further recruitment and retention issues. We ask that you please consider this testimony and remove the grade band licensure changes indicated on pg. 1356, lines 41655-41672, leaving them to remain organized as P-5, 4-9, and 7-12.

Thank you,

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