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STATE OF MIND:  
A POSTSTRUCTURAL ANALYSIS OF GOVERNMENTALITY AND TEACHER  
EDUCATION PROFESSIONALISM USING POLICY TEXTS

A DISSERTATION\*

Submitted to the Faculty of  
Montclair State University in partial fulfilment  
of the requirements  
for the degree of Doctor of Philosophy

by

TODD A. BATES

Montclair State University

Upper Montclair, NJ

2018

Dissertation Chair: Dr. Kathryn Herr

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MONTCLAIR STATE UNIVERSITY  
THE GRADUATE SCHOOL  
DISSERTATION APPROVAL

We hereby approve the Dissertation

STATE OF MIND:

A POSTSTRUCTURAL ANALYSIS OF GOVERNMENTALITY AND TEACHER

EDUCATION PROFESSIONALISM USING POLICY TEXTS

of

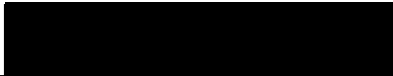
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Doctor of Philosophy

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## ABSTRACT

STATE OF MIND:

### A POSTSTRUCTURAL ANALYSIS OF GOVERNMENTALITY AND TEACHER EDUCATION PROFESSIONALISM USING POLICY TEXTS

by Todd A. Bates

This dissertation comprises a multilayered inquiry into the complex interplay between governance and teacher education. It adopts Goodlad's (1990/1994) stance that teacher education best serves democratic society when it is self-governing and maintains decision-making authority with respect to the preparation of teachers. However, pervasive and prescriptive state and federal policies create a regulatory context that supplants the ability of teacher educators to exercise authority over fundamental aspects of their work, including the identification, recruitment, preparation, and assessment of future teachers.

Bacchi and Goodwin (2016) argue that prevailing educational policy critiques underexamine *governmentalities*—mindsets that render individuals and societies governable (Foucault, 2007). Governmentalities facilitate control by constructing “normal,” “logical,” “necessary,” and “inevitable” answers to questions about “how to govern oneself, how to be governed, by whom should [one] accept to be governed, how to be the best possible governor?” (Foucault, 2007, p. 88). From this perspective, policy critiques that fail to notice and resist governmentalities insufficiently defend professional autonomy; they instead tacitly (re)negotiate conditions under which a profession will accept subjugation.

This study traces deprofessionalizing policy discourses within state-issued, public documents related to 2015 amendments to New Jersey’s teacher licensure law (NJAC 6A:9). It is a poststructural policy critique that seeks to resist governance by disputing the inevitability, necessity, and logic of policy problematizations. Like previous “WPR” studies (Bacchi & Goodwin, 2016), this one unpacks *What Problems are Represented to be* within a focal policy and prioritizes elicitation of questioning by the reader over reporting of researcher findings. This dissertation, however, extends the methodology as proposed, attempting also to *embody* exploration of the structures that comprise *how answers are represented* within dissertations. Specifically, it employs “experimental” (Richardson, 1997), “ergodic” (Aarseth, 1997), and “deconstructed” (Derrida, 1980) approaches to text that call attention to the pervasive, yet typically unquestioned, structures of academic writing.

Together, the critical policy analysis and the atypical format in which it is presented seek to raise critical awareness of governmentalities that support externally-imposed structures that erode the autonomy of teacher education, as well as self-imposed structures teacher educators enact themselves, inadvertently participating in the of confining their understandings of what *can* and *must* be.

## ACKNOWLEDGEMENTS

My goal when enrolling in the TETD program was to be present in the institution—to immerse myself in learning what it meant to be part of Montclair—a desire made easy by the outpouring of support from MSU’s faculty, staff, and students. I would like to begin by thanking my chair, Kathryn Herr. Without Kathryn’s gentle guidance, resolute encouragement to “sit with” the process, and frequent (re)assurance that she could tell I was “chewing on” important things, this dissertation would not exist. I would also like to thank my committee, to whom I feel deeply indebted. Michele—much of the way this dissertation took shape is your fault; thank you for that. Pablo—I am so glad that our paths crossed; we still need to go fishing. Suzanne—I am sorry that I dropped your class after one after the first session; I am so, so glad that we found other meaningful ways to work together.

I am similarly grateful to Ana Maria Villegas & Tamara Lucas, without whom there would be no TETD program as we know it; Jen Robinson & Sue Taylor, who together serve as my personal exemplars of leadership and dedication in teacher education; and Tina Jacobowitz, Peggy Freedson, and Nicole Barnes, who were among the first to offer me a seat at the table and a voice in the teacher education conversation.

Thanks are also due to countless teachers, colleagues, and classmates who have helped me, guided me, listened to me, and (when I needed it) pushed me to get to this point. Special thanks goes to the TETD faculty and students; the NMUTR family, including the residents, Julianne Bello, Sonal Chauhan, Naome Dunnell, Ruben Irizarry, Joanne Matkowski, Angela Piombo, Kimi Santos, Michelle Shanahan, Tracy Steneken,

and Alex Sturm; my CEHS friends and colleagues, including Joe Bavazzano, Connie Donvito, Melissa Harris, Margaret Miller & Pat Gagnon, Carla Parry-Engstrom & Adrian Regan; Amanda Baden & the Adoption Research Team; Eden Kyse, Inem Chahal, Lina Acosta & Erin Bunger, Paige Frenkel & Theresa Cannone, Tina Seaboch, and the rest of amazing staff at CREEHS; the ECELE, EDFD, & SASE Departments, plus faculty in the Arts and Sciences, including Donna Bogart, Ada Beth Cutler, Rebecca Goldstein, Steven Greenstein, Sumi Hagiwara, Dorothy Heard, Priya Lalvani, Tanya Maloney, Kerry McKibbin, Fernando Naiditch, Kristin Scrabis-Fletcher, Minsun Shin, Trish Watson, Leslie Wilson, Mayida Zaal, and the late Susan Wray.

Thank you also to the teachers who shaped who I was before coming to MSU, including Susan Lytle, Vivian Gadsden, Phillip Buckley, and the late Larry Sipe from Penn—your influence on this dissertation is obvious, as is the role you played in my thinking and my life; Marnie Morrison at Ohio State and Amy Mathur, Paula Wagoner, Kathy Westcott, Steve Croyle, Beth Smolcic, and Dave Witkovsky at Juniata—you helped me focus on doing good, not just doing well; and Mr. Albinak, Mrs. Bean, Ms. Clark, Mr. Fedema, Mr. Hillman, Ms. Lewis, Mrs. Kenyon, Mr. Smith, Mrs. Musiel, Ms. Nowicki, and Coach Zedrow—you taught me to learn. Additionally, I would also like to express my gratitude to Penny, Brenda, Nicolette, Lynne, and Marcia—your gentle reminders and emails were critical to me actually graduating.

This work also required the input, guidance, and camaraderie of critical friends. Among many, I would like to thank Veronica Barrios, Brenna Bohny, Deb Broderick, Susan D’Elia, Kani Diop, Connie Ducaine, Sarah Hobson, Dave Johnston, Nora

Peterman, Beverly Plein, Rebecca Swann-Jackson, Sara Wasserman, and Michele's writing group—each of you left a mark on my dissertation and on my life. I would also like to extend a separate thank you to Laura & Jim Nicosia for their unwavering support; Margaret Jusinski & Shelley Kurland, my first critical friends at MSU and hopefully lifelong friends after; and Charity Dacey & Meghan Bratkovich, with whom I spent so many snack-filled hours reading and editing, laughing and arguing, writing and rewriting that I am now convinced that we are all writing facets of the same dissertation—this would not have been possible without all of you.

I need to thank my friends for the care, diversions, and laughs that sustained me during this project. In particular, I would like to thank Julie Szymczak & Melissa Billings for lending me their husbands, Evan & Lee, for hours a week so that we can continue to save the universe together online, and Jon, Kristin, & Magdalena Larsen for always being there to talk politics and picturebooks. I could not have done this without the ceaseless cheering from the Josephsen team bench: Paul, Janine, Greg, Catie, Kell, & my growing pile of nieces and nephews; Dr. & Mrs. J; Mimi; Unk & Karen; Aunt Mo & Uncle Mike; the Dorritys; Aunt Shiela & Uncle Bobby; Pat & Ann; plus a whole mess of cousins. Nor could I have done this without Corey & Brian, cousins who have been like brothers; and Aunt Karen & Uncle Mike and Uncle Vincent & Aunt Audrey, who were always there for me. I am eternally grateful to my amazingly supportive parents, Tom & Sandi, my first teachers, who instilled in me a love of learning, a curiosity about the world, and a restlessness in pursuit of knowledge that guides me every day.

Lastly, it is with love and gratitude that I thank my wife, Maureen, who has stood beside me, cheering me on every step of the way. She has been a sounding board, a co-writer, a colleague, and a friend throughout this process. I have never known anyone who is so dedicated and committed to doing their job well; she is the best teacher I have ever known, the best friend anyone could ask for, and a better wife than anyone could deserve. The world is better because she is in it, and I am so lucky to explore that world with her by my side. Thank you, Maureen; I cannot wait for our next adventure.

## **DEDICATIONS**

This is for us all.

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## PREFACE

Potty training is hard. I want to make sure that is out there before I continue. Although I am not a parent, I have taught preschool-aged students, and I have seen the frustrations and triumphs that often come along with potty training... for everyone involved.

Several years ago, my sister-in-law, Janine, aware of both my sympathetic stance toward the struggle of potty training and my experience working with preschool-aged children, came to me with a question as she was working to help my niece to become potty trained. Based on other suggestions and the experiences that she had potty training my niece's older brother, she had implemented a simple reward system for instances in which my niece successfully went to (or tried to use) the bathroom: M&M's. This plan was working well... too well, in fact, which is why Janine approached me.

Janine was concerned that my niece was eating too many M&M's as a result of the reward system, but she was concerned that cutting back on the reward would also cut back on my niece's willingness to use the bathroom. I asked her what the routine for offering the reward looked like, and she replied that, after verbally demonstrating her excitement at my niece's accomplishment, Janine would ask if she wanted M&M's. My niece's reply would always be an enthusiastic "Yes!" and then Janine would give her a small handful of M&M's as a reward. Compounding the problem was that after eating the small handful of M&M's, my niece would request more and, despite her better judgement, Janine would sometimes give her another small handful of M&M's.

After considering the situation, I asked if Janine was aware of the largest number my niece knew, immediately after which Janine called over to my niece asking the same question, which received an enthusiastic “Six!” Based on that, I suggested that Janine ask, “How many M&M’s do you want” rather than her typical “Do you want M&M’s?”

Janine called me a few days later, happy to report that the suggestion had worked and that my niece was getting, at most, 12 M&M’s, because even if she asked for seconds, the largest number she knew to request was six. In reality, 12 M&M’s was far fewer than she had been receiving initially, but she was thrilled that she was, in essence, receiving twice the largest number of M&M’s she could imagine.

While happy that Janine had worked out a viable strategy for potty training (and found another opportunity to practice counting with my niece, even if it was only to six), I was also a bit sad that I had participated in helping to deceive my niece. What I had essentially done was help to reinforce or to create a system of “governmentality” in her actions with my niece (Foucault, 2008). Governmentality is the “art of governing” with the goal of producing “docile bodies” (Dwyer, 1995, n.p.; Foucault, 2008)—in other words, governmentality helps to produce ruleable subjects whose subjugation does not require the use of overt force.

When Janine began to offer the six M&M’s as a reward, excitedly counting off each of the candies with an enthusiastic “One! Two! Three!” and so on, my niece completely missed the fact that she was receiving fewer of the candies than she had been before. This was, in part, an error of conservation, because *six* individual candies seemed bigger than *one* small handful, even if the handful contained upwards of 10 candies.

However, beyond that, Janine was able to do things like offer a smaller number of candies as a second helping (e.g., four), to which my niece would enthusiastically demand the six to which she felt entitled. Feigning reluctance, Janine was then able to acquiesce to my niece's (adorable) demand, which let my niece feel as though she had won a victory, yet allowing Janine to exert control over the situation in a way that was not overtly apparent. In the end, Janine could offer fewer candies as first and second helpings *in total* than she may have freely given as a first helping earlier on, while never feeling like the "bad guy" or prompting any form of objection from my niece. In essence, my niece was being manipulated, but in such a way that she felt, at worst, not like a victim, but more likely, as the victor — she had, after all, successfully convinced her mother to give her two times the biggest number of M&M's she could imagine.

In essence, Janine was cultivating a system of governmentality because she was creating a system that allowed her to limit my niece's intake of M&M's. Similarly, my niece was engaging in the construction of governmentality by developing a *govern(able-\_)mentality*. She co-created this *govern(able-\_)mentality* by unknowingly participating in the drafting of conditions that actively worked against her goal of getting as many M&M's as she could. More than that, however, my niece had developed a *mentality of governance*, which then shaped what she saw as and understood to be "fair." Janine was no longer required to enforce her own idea of what was fair, because my niece had come to see six M&M's as the peak of and standard by which fairness could be measured.

This additional level of governmentality, cultivated by/in my niece was visible in a variety of ways and reduced Janine's need to explicitly exert power, not only reducing the need to limit the reward for potty training, but also in other similar instances. For example:

- a) My niece not only helped to construct these conditions, she was excited about the result (even though it worked against her), even though she had previously been receiving on the low end about 10 M&M's and on the upper end greater than 20;
- b) My niece no longer pushed back against Janine about how many M&M's she was offered, because she had accepted the system as reasonable;
- c) My niece would (enthusiastically) participate in enforcing these conditions, which she accepted as fair and normal, upon those around her (e.g., saying it wasn't fair if her older brother got more than six candies for something, or urging her younger sister to get up to six candies if the biggest number her sister knew to ask for was three).

I bring up the example of Janine and my niece because it illustrates, albeit in a relatively simplistic way, how governmentality develops, and how easy it is for individuals to unknowingly co-create the conditions by which they are controlled, even when it works against their own interests. Like parents, teachers are charged with the care and control of children, which is particularly important because such individuals cultivate governmentality in the minds of those children and are essentially unquestioned in their right to regulate the conduct of those in their charge. In turn, those children then

grow up and participate in society, carrying with them and building on the governmentality developed when they were young.

Across American history, teachers, and public schools in general, have adopted the English practice of acting *in loco parentis* for their students (Conte, 2000; Jackson, 1991; cf. Bowden, 2007; Stuart, 2010). This traditional view of schooling reflects the dual role and shared responsibility that parents and teachers have played in the raising, educating, and nurturing of children. For parents and teachers, the *in loco parentis* stance assumes an oversight and disciplinary control of children enacted for their own good, development, and protection (Stuart, 2010). However, this stance also presumes a certain level of (excusable) ignorance on the part of the children. Preventative actions are taken by adults who are presumed to know better in order to safeguard children from themselves, from their ignorance and lack of experience, and from the harsh realities of a world for which they are not yet prepared and of which they have little knowledge. Factors such as these help to justify the control that well-meaning adults exercise over children, enacted through well-understood roles of parent (or custodian/guardian) and teacher.

Within teacher education, another entity, the State (in the Marxist sense, which will be represented with a capital “S” as opposed to the lowercase “state,” which will denote one of the fifty U.S. states), enacts an *in loco parentis*-style regulatory role over P-12 schooling and teacher education processes. Typically occurring at the post-secondary level, university-based teacher education programs prepare undergraduate and graduate students to become teachers in P-12 public schools across the nation. Within these



processes, teacher education professionals and U.S. state governments typically divide the responsibility of preparing and educating teachers from credentialing them. Although the exact roles vary by state (Loeb, Miller, & Strunk, 2009), states typically gain the authority to regulate teacher licensure from the state constitution (Roe, Herrington, & Kister, 1999), but primarily entrust direct responsibility for the preparation, education, and training of teachers to university-based teacher education programs. The states' role in teacher preparation has often fallen to primarily recognizing the recommendation from a teacher education program that a candidate be granted license to teach. Essentially, in this model teacher education and State government act together as "parents" over the process of teacher preparation, with teacher education primarily responsible for preparing candidates and states primarily responsible for certifying that candidates have completed all necessary preparation requirements. However, following the so-called manufactured crisis of education (Berliner, 1995; Berliner & Biddle, 1996; Berliner & Glass, 2014) outlined in *A Nation at Risk* (National Commission on Excellence in Education, 1983) and the resulting moral panic about preserving global competitiveness (Hargreaves, 1994), teacher education became an increasingly policy-laden and policed space (Furlong, Whitty, Whiting, Miles, & Barton, 2000) Essentially, the State assumed a more paternalistic role, subordinating teacher education to a technical role, in which teacher education programs, to varying degrees, are responsible for enacting the State's vision for teacher preparation, using mandated methods, measures, and procedures.

State governments imposed these more prescriptive and paternalistic policy mandates on the processes, measures, and content of teacher education, and disregarded

notions of situated (Quicke, 2000) reflective/in-practice (Schön, 1987), and specialist knowledge (Hoyle & John, 1995). This eroded the autonomy of the profession (Hoyle & John, 1995; Larson, 1977) and demonstrated a shift in power from self-governance as a profession toward expectations of external accountability to the states (Hoyle & Wallace, 2005). Self-governance of the profession is a defining element of professionalism and a reflection of trust and belief (on the part of the State) that professionals are privy to a significant and hard-to-acquire, specialist body of knowledge (Hoyle & John, 1995). By eroding the autonomy of the profession, the State invalidated teacher education's claim to specialist knowledge and autonomous professionalism, relegating it to the role of an unruly and unproductive child in need of regulation and oversight for its own safety and good.

In essence, State policy impositions on teacher education function as markers of deprofessionalization, which codify a calling into question and jeopardization of the profession's knowledge bases and self-governance, as well as its freedom to leverage those factors in the unhindered preparation of new professionals. These policy actions run contrary to the belief that the profession must be self-governing and autonomous, or "free from bureaucratic and political constraint to act on judgements made in the best interest of the [teacher education students]" (Hoyle & John, 1995, p. 77), for education to succeed and flourish in a democracy (Goodlad, 1990, 1994).

Within a Foucauldian poststructuralist analysis of governmentality, it is important for individuals and groups to work toward liberation and freedom by resisting governance and working toward a "deregulated" self (Foucault, 1990, 1992). This deregulated self is

more free from external constraint and beholden to self-governance, rather than overt State control or punishment (Foucault, 1990, 1992). In doing this, society can function in a way that will “allow these games of power (rule of law, techniques of management, ethics) to be played with a minimum of domination,” which for Foucault, is a main goal of humanity (Foucault, 1988, p. 17). Foucault also argues that power is primarily a force for creation, and not for coercion, stating:

We must cease once and for all to describe the effects of power in negative terms: it ‘excludes,’ it ‘represses,’ it ‘censors,’ it ‘abstracts,’ it ‘masks,’ it ‘conceals.’ In fact, power produces; it produces reality; it produces domains of objects and rituals of truth. The individual and the knowledge that may be gained of him [*sic*] belong to this production. (p. 194)

This view of power as creative force runs counter to many interpretive forms of policy critique, even some that draw on the work of Foucault, which view power primarily as a coercive influence (e.g., Gledhill, 2000; Molm, 1997; Raven, 1958; Wade, 2000). In essence, the creative view takes the position that power is used to create and shape reality in a way that makes the policing of individuals and their behaviors appear to be natural and necessary functions of the State. This counteracts more heavily Marxist views that the State’s power is the ability to exact justifiable violence on its citizens, wherein power is coercive and punitive. Foucault’s (1977) stance takes up a more subtle view, in which the creation of mentalities and narratives of justification of control, rather than the direct application of violence, act as the central way in which power is described.

Though poststructuralism is, by its very nature hard, if not impossible, to define (though some have tried, e.g., Butler, 2011; Harcourt, 2007; Williams, 2014) the policy analysis method described by Bacchi and Goodwin (2016), makes central some distinctions that locate it within poststructuralist traditions. For one, Bacchi and Goodwin's approach focuses on the creative nature of power and privileges the unravelling of created narratives of justified control as an effective way to combat undue and oppressive governance enacted by the State and justified through policy. At the same time, this method positions other, more common approaches to policy analysis and critique, which tend to focus on the interpretation or resistance of things within policies (e.g., their problematizations, proposed solutions, validity, veracity, theorizability, rationality, etc.), as incomplete. From the perspective that power creates justification for control, more common policy analysis approaches, such as the rational model (Kaiser, Godschalk, & Chapin, 1995) or process model (Jann & Wegrich, 2007), miss an opportunity to resist the policing of behavior and individuals justified *by* policies, by becoming unnecessarily focused on addressing and critiquing things *within* policies. Consequently, Bacchi and Goodwin's approach falls in line with Foucault's notion of the State's creative power, and therefore attempts to step back and focus on the rejection of policy implementation (i.e., a focus on critiquing justification by policy). It does this to avoid falling into the trap of offering "better" solutions to the problems that policies are purported to address (i.e., a focus on critiquing things within policy). Avoiding this engagement in the "fixing" or "strengthening" of aspects within policy, rather than rejecting the State control that accompanies policy, may cause individuals to

inadvertently participate in negotiating the terms of their own oppression. This is not positioned as a destructive practice that erodes or protects individuals' freedom. Instead, this poststructural approach views this as a "creative" process by which docile citizens are produced, because they have negotiated and constructed the conditions under which they may be controlled—a primary goal of State control.

Although they may not seek to directly propose solutions to the problems in educational policies, poststructural policy analysis methods that follow Foucault's (1977) position on power, such as those developed by Bacchi and Goodwin (2016), position the raising of critical awareness of governmentality as inherently political, valuable, and important work. This critical awareness focuses on revealing the ways that policies create justification for governing structures and oppressive narratives that make State control appear to be normal, natural, and necessary. These notions, which make governance and particular forms of control appear inevitable and indispensable, comprise the governmentality that poststructural policy analyses attempt to uncover and critique.

While others have posited how best to proceed following poststructural policy analyses (e.g., McKee, 2009) or after having adopted a post-Foucauldian understanding of governmentality (e.g., Stenson, 2005, 2008), this study is not intended to offer pathways to proceed after examining policy. I see the development of a critical awareness of governmentality in education as the focus and limit of the scope of this study, which is not to say that this study pretends to be apolitical or that it lacks action or purpose; rather, the development of a critical awareness of governmentality *is* the work of resisting governance, and is not a *precursor* to "real" resistance.

The development of a critical awareness of governmentality resonates with the goal of developing a critical consciousness as described in Freire's (1970) *conscientization*. This approach to poststructural analysis similarly seeks to notice and to resist the creation of governing mind-sets and social myths that reinforce hegemony, grand narratives of oppression, and the delegitimizing and silencing of groups' collective power in the face of State control and oppression. Also, as with conscientization, poststructural scholars such as Bacchi and Goodwin (2016) view the raising of critical awareness as an inherently political act that is a fundamental and valuable process in and of itself, not merely a simple prerequisite to meaningful action. In other words, "[t]he critical task, therefore, becomes tracing and assessing the *specific forms* of reality that power creates" (Bacchi & Goodwin, 2016, p. 3, emphasis in original) and how those specific forms of reality, in this case created and documented in policy, can be used to produce docile and productive bodies (Foucault, 1977; cf. Dwyer, 1995; Robinson, 1993; Winning, 1993) that submit their autonomy, knowledge, identity, and power to external governance.

Governance has traditionally had and continues to have a place within education, however the State is not a benevolent parent, and teacher education is not an unruly, ignorant, and inexperienced child in need of justified discipline. Unfortunately, it falls to the profession to critique and reject undue and intrusive governance by the State, and there have been multiple and diverse attempts at doing so from a variety of theoretical and methodological perspectives. However, at least in part, the way in which the profession fights back against deprofessionalizing policy mandates determines the degree

to which it frees itself from State governance, or the degree to which it merely negotiates the terms of its external regulation.

As a window into this process, I will be applying a poststructural approach to examine teacher education and the policies that govern it, because such policies act as a codification of governance of the control of the teachers who influence children in public schools, and poststructural methods help to make governance visible within those documents. Moreover, such policy analyses examining governmentalities in education can serve as one way to raise a critical awareness of structures of governance that confine and deprofessionalize education and teacher education.

This dissertation builds off of one method, the WPR Approach (Bacchi & Goodwin, 2016), which draws on a Foucauldian poststructuralist perspective, to examine how problems are represented in and created by timely and specific policy documents that propose new, imposed measures on teacher education. This work provides one illustration of how applying the WPR Approach to teacher education policy can call into question and reject the inevitability, rationality, and normality of external governance of teacher education. This method could provide teacher education with a valuable, currently underutilized framework for leveraging poststructuralist understandings to critique and resist the concession of professional autonomy that occurs through yielding to State policies dictating approaches, measures, and requirements for the development of teachers. By focusing on noticing and rejecting the constructed nature of policy problems and solutions, rather than on negotiating, describing, or discussing problems in education, this approach helps to reclaim and safeguard teacher education's right to control the

development of new teaching professionals. In short, this approach offers one way to notice and cast off the development of governmentalities or the impositions of State governance—one method that protects Goodlad’s (1990, 1994) vision that teacher education can and must claim, and then retain, the same level of professionalism and self-governance enjoyed by other professions, not only for its own good, but for the retention of unobstructed education in a democratic society.



## CHAPTER ONE

### PROFESSIONAL AUTONOMY: A NOTION AT RISK

While governmentality is visible in nearly all facets of society, it is particularly apparent in educational contexts. This occurs because schooling, particularly public schooling, not only socializes individuals into the “knowledge” seen as valuable in society, but also into the mentalities that allow for governance within a society. This governance includes overt State governance of individuals within society, as well as all forms of governing the other and the self (Mitchell, 2006). While analyses of “government” or “governance” typically focus on “official,” State governance, analysis of governmentality also takes into account the reflexive relationships between State, other-, and self-governance, which together provide insight into “how the modern sovereign state [*sic*] and the modern autonomous individual co-determine each other's emergence” (Lemke, 2001, p. 192).

Before continuing on in this conversation of governmentality in education, it is important to note that for the purposes of clarity, the term *schooling* will refer only to P-12 public schooling, whereas *teacher education* will refer to the university-based preparation of future teachers and metonymously to processes and stakeholders involved in those spaces. In contrast, *education* will refer to both the processes of P-12 schooling and State-regulated, university-based teacher education, together with their respective stakeholders. In the same vein, *teacher* will be used to refer to those educators based in P-12 public school settings, while *teacher educator* will refer to those tasked with the

preparation of teachers within university settings. The more general term *educator* will be used to refer to both teachers and teacher educators together.

Bearing those definitions in mind, education, comprising both compulsory P-12 public schooling and the State-regulated teacher preparation of the teachers who will teach in those schools, provides an essential site from which to notice the construction of governmentality in society. Much like influencing parenting, controlling or regulating education alters future generations by shaping the development of governmentalities in the young. In turn, those governmentalities greatly affect the way that individuals self-regulate and what forms of governance they accept as normal once they are grown (Foucault, 1980; Lemke, 2002). Consequently, examining governmentalities, in particular those related to the governance of the young, is particularly important within democratic societies, because governmentalities shape what individuals see as rational, acceptable, and normal with regard to their own governance (Beaumont & Nicholls, 2008; Raco & Imrie, 2000).

Prior to this exploration of governmentality in education and teacher education, it is helpful to examine the origin and previous uses of the term, ways in which governmentality functions in those spaces, and effects of governmentalized mindsets in education. *Governmentality* is a neologism made by Michel Foucault, a French poststructuralist thinker, who coined the term in the late 1970s. Foucault suggested that exploring governmentality could help to answer questions about how individuals in a society come to an understanding of “how to govern oneself, how to be governed, by whom should [one] accept to be governed, how to be the best possible governor?”

(Foucault, 2007, p. 88). According to Foucault (1977, 1980), comprehending governmentality requires an understanding of the production of the mindsets that determine how to govern the conduct of others, in particular, the ways to govern children. Foucault, (2003) notes, “[t]o govern, in this sense, is to control the possible field of action of others” (p. 79), which is to say that governing children involves setting limitations on the possible actions (and therefore lived realities) that those children inhabit or may inhabit in the future.

### **Governing Children as a Way to Govern Society**

Childhood is the “most intensely governed sector of personal existence” (Rose, 1999, p. 123), and education during childhood represents a “nodal point at which many knowledges surrounding childhood, families and parenting, schools and education intersect” (Ailwood, 2004, p. 22). Despite this, among studies of education there “has been a concern for maintaining childhood as natural and innocent,” which perpetuates:

[...] the idea that human sciences like educational studies stand outside or above the political agenda of the management of the population or somehow have a neutral status embodied in a free-floating progressive rationalism [,which] are dangerous and debilitating conceits. (Ball, 1998, p. 76)

These well-intended, yet detrimental approaches to research tend to bypass opportunities to examine how educational processes contribute to the inculcation of the young into governmentalities, which is particularly perilous given the magnified influence that shaping children’s perspectives has on society as those children age. In contrast, a Foucauldian approach to research on governmentality emphasizes that the raising and

educating of children are not apolitical processes. Moreover, considering research in this way acknowledges that “there is a complex interplay between society and its institutions for children” that is undeniably political (Moss & Petrie, 2002, p. 171). Furthermore, such an approach also “casts doubt over the redemptive hopes invested by politicians and policy makers in children’s services” believing that “If we know how to read them, public provisions for children offer narratives about their society, its values and dominant understandings” (Moss & Petrie, 2002, p. 171). The influence that shaping children’s mindsets has on society means that learning first to see, and then to (re)read and to (re)write constraining and normalizing narratives offered to children, becomes an important and valuable research task.

Kim (2014) recognizes that school serves as one of the primary locations in which children learn how to “effect by their own means or with the help of others a certain number of operations on their own bodies and souls, thoughts, conduct, and way of being, so as to transform themselves” (Foucault, 1988, p. 18), and in doing so “become a ‘good’ school student” (Kim, 2014, p. 92). Since schooling helps to communicate and normalize ideals that reflect existing governmentalities in society, school in turn, helps to shape perspectives on how one ought to behave that live beyond students’ time in the school (Kim, 2014). Consequently, the governmentalities cultivated in children during their schooling often act in service to perpetuating, preserving, and protecting governance and social order as it is, bolstering the State’s capacity to affect “ruling by schooling” (Curtis, 2012, n.p.). Individuals socialized to consider governmentalities as normal ways of being rather than as forms of social control do not require overt State coercion to obey and

enforce rules, consent to rule, and behave in ways that are ruleable, constructing a situation in which “governor and governed are two aspects of the one actor” (Dean, 2010, p. 12).

### **Government: The Art of Governance**

Foucault (1997) notes that government is “the broad sense of techniques and procedures for directing human behaviour” (p. 81). Dean (2010) adds that government also comprises the ways in which public and private conduct (behavior) is assessed, evaluated, and controlled. As a way of concisely understanding government, Foucault (1982) described it as the “conduct of conduct” (p. 220-1). In other words, this definition relies on word play of the multiple pronunciations and meanings of “conduct” to help describe government as the power and right to control or act on (to conduct) the behavior of others (their conduct). Both Foucault (1982) and others (e.g., Li, 2007) note that this regulation differs from discipline, which involves the supervision of individuals within confined spaces, such as prisons, mental health facilities, and schools, which each deal with the control of particular groups. Government, in contrast, targets control of the population at large, ostensibly for the welfare of the population (Foucault, 1991). Government achieves these means, not through the unattainable, direct coercive control of every citizen, but by “educating desires and configuring habits, aspirations, and beliefs” (Li, 2007, p. 275). This education is central to individuals developing governmentalized mindsets that constrain not only behavior, but also conceptions of what behaviors seem possible. As Scott (1995) put it, government is concerned with

“arranging things so that people, following their own self-interest will do as they ought” (p. 202).

Given that education serves as a method for normalizing governmentalities, schooling becomes an important aspect of government and a tool of governance. Schooling helps to bring the populace into the governmentalities that, in their ubiquity, become normalized societal expectations that no longer require overt State coercion to achieve. This normalization is a pivotal factor in governance because most individuals, according to this view, self-regulate their own behavior in relation to these societally-developed, governmentality-laden norms, desiring to move toward accepted norms and away from negative norms. Moreover, this perspective suggests that individuals will regulate the behavior of those around them toward similar ends. In essence, analysis of governmentality is facilitated by attention to “the political management of populations and how this management is reflected in institutions created for children,” which can serve as a starting point for meaningful exploration and an entry point into “a critical diagnosis of the ways in which subjects are governed, govern themselves and each other” (Ailwood, 2004, p. 22).

### **Autonomous Teacher Education in a Democracy**

Rejecting governmentalities within schooling and teacher education equips teachers and teacher educators to better understand (and potentially push back against) mechanisms, techniques, and institutions that would act to dismiss or confine their expert knowledge and experience, restrict their pedagogical freedom, and undermine their professional autonomy. Fighting to retain professional autonomy in this way requires

that steps be taken to expose the underlying mentalities of governance that are written onto teacher education and that flow into the teaching and schooling that co-construct governmentalities in society.

Foucault's (1982) parsimonious "conduct of conduct" phrasing helps to define government; however, Dean (2010) elaborated on that definition in a way that better sets the stage for analysis of government by making it easier to see and notice how governance occurs. Dean describes government as follows:

[A]ny more or less calculated and rational activity, undertaken by a multiplicity of authorities and agencies, employing a variety of techniques and forms of knowledge, that seeks to shape conduct by working through the desires, aspirations, interests and beliefs of various actors, for definite but shifting ends and with a diverse set of relatively unpredictable consequences, effects and outcomes. (2010, p. 18)

Accordingly, Dean (2010) states that analysis of government must therefore attend to exploring how government conducts the conduct of others in society.

Therefore, Dean asserts that analysis of government:

[...] is concerned with the means of calculation, both qualitative and quantitative, the type of governing authority or agency, the forms of knowledge, techniques and other means employed, the entity to be governed and how it is conceived, the ends sought and the outcomes and consequences. (p. 18)

Given that description, as well as the belief that professions must retain the autonomy to be self-governing with respect to the development, preparation, and assessment of their

own professionals (Goodlad, 1990, 1994; Hoyle, 1974; Hoyle & John, 1995; Larson, 1977; Osgood, 2006), the tasks of noticing governance and defending professionalism can be understood and approached as intertwined processes.

Goodlad (1994) argued that for education to survive and thrive in a democracy, particular conditions, which he called postulates, must be met and upheld. Among the twenty postulates (1994, pp. 72-93) that formed the basis of the “Agenda for Education in a Democracy” was a vision for teacher education as a profession “autonomous and secure in [its] borders” that “must enjoy parity with other professional education programs (such as those of law and medicine) [...] and decision-making authority similar to that enjoyed by the major professional schools.” Additionally, the teacher educators who prepare the nation’s teachers must be those who “authorize [the teachers’] right to teach” (Goodlad, 1990, 1994). Furthermore, Goodlad (1990) stressed how important it is that teacher education “[tolerate] no shortcuts” with respect to the preparation of teachers, and that no concessions be made to produce greater numbers of teachers, meet unnecessary expectations, or adhere to a “regulatory context” that out of sync with the professional vision “with respect to licensing, certifying, and accrediting” expressed in the postulates. Within this vision for the profession, Goodlad argued that teacher education “[tolerate] no shortcuts” that infringe upon the autonomy and authority of teacher education to prepare future teachers, assess and certify their quality, and to do so free of oversight, mandates, and external governance. From this position, the role of teacher education is not limited to the preparation of future educators, but also encompasses the responsibility



of teacher education to fight for, retain, and accept nothing short of full professional autonomy and secure borders of self-governance.

### **Study Stance**

The stance that I adopt for the present study, and which rests at the foundation of the conceptual framework at my current institution's teacher education program, does not reject that the Federal and Constitutionally-grounded structures of U.S. public education charge the 50 individual states with the responsibility to maintain and meet high standards for the licensure of teachers. On the contrary, Goodlad (1990, 1994) asserts that for education to thrive both within and for a democracy, professional borders must be respected. At the same time, my own critical stance both recognizes and seeks to resist the increasingly common trend of State governance attempting to attain these high standards for teacher licensure by dictating to teacher education the acceptable methods and measures that may be used to prepare and assess future teaching professionals. As an alternative to this, my critical stance draws on both Goodlad's postulates and poststructural theory's resistance to excessive and external governance as a foundation for the rejection of such deprofessionalizations. Applying this stance, I firmly assert that teacher education should reclaim and then retain the authority to convey to the State which methods and measures are meaningful, program-aligned, research-based, and appropriate prerequisites to teacher licensure and granting access to the profession by first taking a critical eye to deprofessionalizing policies, procedures, and assessments mandated by the state.

### **Deprofessionalization in Changing NJ Licensure Policy**

It is not uncommon that State policies and mandates fail to consult, or even run counter to, the research, beliefs, best practices, and knowledge base of education (Cohen, McCabe, Michelli, & Pickeral, 2009; Coloma, 2015; Croft, Roberts, & Stenhouse, 2016; Eisenhart & Towne, 2003; Guisbond & Neill, 2004; Gurl et al., 2016; Ravitch, 2014; Reagan, Schram, McCurdy, Chang, & Evans, 2016; Tuck & Gorlewski, 2015) but educators and teacher educators are nonetheless compelled by law (a form of governance) and tradition (a mechanism of governmentality) to enact such policies. When governance does not draw from education's knowledge base, but instead regulates conduct in absence or opposition to this situated knowledge and ignores the opportunity to work with teachers and teacher educators to develop policies that promote complex and democratic teaching (Carter & Lochte, 2017; Darling-Hammond, 1996; Goodlad, 1990, 1994) it is deprofessionalizing and both reinforces and creates deprofessionalizing governmentalities. Deprofessionalizing governmentalities, in turn, suggest that education should acquiesce to and accept such measures and mandates as they happen and in the future, despite knowing better, or that teacher education should attempt to reason with and/or negotiate the terms under which it will accept such mandates.

New policy documents imposing state-mandated, standardized testing of teachers represent only one of a growing number of intrusions by the State into what had once been seen as the professional domain of teacher education. These new regulations build on previous, but similar instances of deprofessionalization. These include the 2016 implementation of the Praxis I, and requirement of the Praxis II in the early 2000s, in which the State overstepped the traditional boundary between the government's right and

responsibility to ensure high quality teachers achieve certification and the profession's right and responsibility to decide the measures used to admit, prepare, and assess future teachers.

By mandating the use of the Praxis I, which is now required prior to admission into a teacher education program in New Jersey, the state removed the right of teacher education to determine who is qualified to study to become a teacher. Similarly, by requiring the implementation of the Praxis II, which is mandatory for teacher education students prior to beginning their clinical practice (as student teachers), the state eroded teacher education's ability to determine who is ready to begin to practice teaching.

In each of these instances, the state listed the only instruments that would be considered acceptable for preservice teacher preparation and assessment for teacher education, undermining the professional status of teacher education. In doing so, the state asserted control over the instruments used to admit students into teacher education programs (Praxis I), demonstrate content knowledge and permit students to pass into clinical practice (Praxis II), and assess student teaching, exit programs, and grant access to professional licensure (edTPA); furthermore, the state outsourced the right to develop those assessments to external organizations and companies that may have little to no understanding of teacher education or tenuous connections to teaching. At the same time, this move effectively devalued the knowledge, experience, and expertise of teacher education as a profession, substituting what Goodlad (1990) and others with similar concerns about professionalism and state regulation (e.g., Bloomfield, 2009; Carter & Lochte, 2017; Coloma, 2015; Croft et al., 2016; Gurl et al., 2016; Hoyle, 1974; Osgood,

2006; Reagan et al., 2016; Roe et al., 1999; Tuck & Gorlewski, 2015) would likely position as overreaching government regulation over critical transition points in the conduit from teacher education student to professional teacher.

The focal policy of this study, NJAC 6A:9, and the documents provided by the NJDOE to accompany that policy, continued this trend by mandating that a standardized performance assessment be implemented prior to licensure, which granted to the state the ability to control who is able to transition from being a student teacher to a licensed teacher and new professional, and by outlining new and more far-reaching requirements for teacher education programs. Moreover, the focal policy outlined additional requirements that substantively affected teacher education both “indirectly” by altering requirements for candidates and “directly,” through altered requirements for the accreditation and approval of teacher education programs.

As an entry point to rejecting deprofessionalizing governmentalities, I will examine the particular policy document issued by the state of New Jersey in 2015 that called for new, state-wide teacher performance assessments. These updates to the focal policy accompanied the 2016 adoption of the edTPA as the sole performance assessment considered acceptable by the state, an outcome that will affect all teacher education students seeking state licensure beginning during the 2017–2018 academic year. This action by the state effectively represents a *de jure* supplanting of the right of teacher education to utilize the variety of longstanding, institutionally-developed, and program-specific performance assessments that previously comprised the capstone assessments at each teacher education program in the state.

In doing this, the state of New Jersey not only undercut the ability of stakeholders in teacher education to exercise their professional judgement about the best ways to instruct and assess their own students, but also invalidated the notion that any form of performance assessment had even been taking place prior to the state's mandate. In other state-generated documents, such as the document titled "Changes to Traditional Route/CEAS Educator Preparation Programming Requirements" (2015), the New Jersey Department of Education states that prior to mandating the edTPA, there was "no performance assessment for completion," and that now there is a "performance assessment required to earn standard certification" (p. 1). This statement, which will be discussed in more depth in Chapter Four of this dissertation, insinuates that no performance assessment (of preservice teachers) occurred or was required; when in practice every accredited teacher education program in the state required a performance assessment of its preservice teachers prior to recommending them to the NJDOE for certification (National Council for the Accreditation of Teacher Education, 2008; Teacher Education Accreditation Council, 2011). Consequently, these state documents not only provide a glimpse into the present deprofessionalizing discourses surrounding teacher education and occurring through voiding the right of programs to assess their own students and to select the measures by which that assessment is conducted; they also hint at retroactive deprofessionalization. This post-hoc (mis)representation of teacher education erroneously suggests that these new mandated policies add to the rigor of teacher licensure by requiring performance assessment for the first time, rather than

recognizing that the state is controlling the conduct of teacher education programs by supplanting and replacing existing measures.

These State actions serve to deprofessionalize teacher education and make educators act as technicians of the State, pushing teacher educators to prepare future teachers via technical, rather than professional education (Aronowitz & Giroux, 2003; cf. Zeichner, 2010). Such actions reduce teacher educators to street-level bureaucrats in service to a technical vision of teacher education produced by the State (Lipsky, 1980), obviating any pre-existing vision for teacher education being enacted by the professionals responsible for preparing teachers by requiring actions that enact, support, and reinscribe the power of the State. Additionally, erasing the history of teacher education's work in the area of performance assessment undermines the credibility and work of teacher education, creating the appearance of justification for control, oversight, and violation of the autonomy, security, and self-regulation of the field called for by Goodlad (1990, 1994).

This sentiment was echoed by some professional organizations, such as the American Federation of Teachers (AFT), who stated that policy mandates, especially those dictating external teacher performance assessments:

ignore or marginalize the expertise of the faculty in [teacher education] programs. The regulations force education faculty to teach a curriculum that is driven by standardized assessments, rubrics and quantifiable outcomes developed by those not directly connected to those programs or the circumstances of the students in those programs, thereby resulting in violations of academic freedom,

deprofessionalization of the faculty and a reduction of quality in teacher education. (AFT, 2014, n.p.)

In alignment with these beliefs, the AFT affirmed “the professionalism of teacher educators and the importance of maintaining academic freedom of faculty and faculty governance over the curriculum of teacher education schools and programs” (2014, n.p.). At the same time, the AFT (2014) reasserted that policy and assessment mandates, even those proposing or requiring instruments developed by teacher educators, still represent a violation of professionalism by the State if they are mandated rather than adopted voluntarily on the basis of consensus by a particular teacher education program’s faculty.

While organizations, like the AFT, and the scholars concerned about the deprofessionalization of education listed above sought to provide thoughts about why and how this climate of State imposition came to be, this does not mean that my subsequent policy analysis (or poststructural policy analyses in general) will do the same. In contrast, the purpose of this particular work is to notice and call attention to the *de jure* and *de facto* instances of deprofessionalizing policy discourses that erode the self-governance of teacher education necessary in a democracy. This approach does not focus on or attempt to intuit individuals’ motivating factors for creating such discourses (e.g., monetary gain, political advantage, personal ideology). Instead, it attends to the discursive effects of policy texts and the “art of governance” that they enact. Such an approach rejects the inevitability and rationality of connections represented as normal, natural, and necessary by problematizations, and, as an act of resistance, notices the

spaces and places in which policies construct/deconstruct objects, subjects, and rationalities.

### **De-inevitabilizing External Governance of Teacher Education**

This work also attempts to “de-inevitabilize the present” (Bacchi & Goodwin, 2016, p. 47) by calling into question the realness and rationality of the problems that policies attempt to address, as well as the governmentalities that make controlling people via problems seem normal and natural. This “de-inevitabilizing” attempts to call attention to the constructed nature of present, asking if this is the only way things could be, or if other possibilities exist. At the same time, this highlights and resists governmentalities at play in educational policy analysis that prompt educators to accept, interpret, negotiate, assign blame for, justify, or rationalize external governance rather than those that work to maintain, secure, and protect professional autonomy.

This de-inevitabilizing of governance through analysis of governmentality aligns with the belief that:

Criticism consists in uncovering ... thought and trying to change it: showing that things are not as obvious as people believe, making it so that what is taken for granted is no longer taken for granted. To do criticism is to make harder those acts which are now too easy. (Foucault, 2000, p. 456)

These sentiments also resonate with Burchell (1993), who focused on the importance of remembering the “non-necessity of that which we consider necessary to our lives” (As cited in Ailwood, 2004, p. 30) and reflect the goal of creating a “critical



space with a focus on how conduct is conducted” (Ailwood, 2004, p. 30) in order to facilitate the:

[t]hinking through the nonnecessity of our perceived necessities, and linking this in with how we are governed, enables not only an acknowledgement of the way in which our daily lives are governed and managed, but also of the potential for shifts and changes in this governing. (Ailwood, 2004, p. 30)

### **Governing Teaching through Teacher Education Assessment**

In light of this, I plan to de-inevitabilize and critique a particular instance of governance by noting and questioning governmentalities present within and created by the problematizations present in one contemporary New Jersey policy proposal.

Examining the ways that objects, such as “profession” and “performance assessment” and subjects, such as “teacher” are constructed within the proposal that led to the new teacher licensure policy mandates provides a space in which to notice the (re)defining and (re)creating of governmentalities in education policy, possible and impossible actions and identities of educators, and tensions between State control of education and professional autonomy. These new measures act as State-mandated, externally imposed gatekeepers at the threshold between completion of teacher education programs and the authorization to teach. These changes erode teacher educators’ ability to retain the self-governance and professional autonomy that Goodlad (1990, 1994) and others noted was necessary for education to exist within and for a democracy.

This particular policy proposal is a valuable site to examine governmentality in education and teacher education because of its location at the threshold between teacher

preparation and teaching. This position also muddies the waters between State and profession responsibilities, because regulation at the point of licensure exist at one of the most direct intersections and points of contestation between the rights and roles of the state of New Jersey; the state having the authority and responsibility to regulate who is allowed to teach, and the teacher education profession being responsible for preparing individuals to become teachers.

More generally, this policy is one instance that reveals how the boundaries between the rights and responsibilities of the State and of the teacher education profession are shifting in the U.S., with the State functioning not only as an authority granting body, but also as the institution responsible for deciding the measures by which teacher education is permitted to prepare teachers. Such actions not only redraw the lines between the State and teacher education, they also serve to deprofessionalize teacher educators. This deprofessionalization occurs because it curtails teacher education's ability to self-regulate and to determine the measures by which education professionals are selected, prepared, and assessed, and by altering the modes by which preservice teachers transition into teaching. Controlling the conduct of teacher education by controlling who may become a teacher and the methods by which this occurs not only controls the conduct of teacher education, but through teachers and the compulsory nature of schooling in the U.S., regulates all of society.

Based on the definitions of government offered by Foucault (1982) and Dean (2010) outlined above, an analysis of governmentalities in teacher education could lend insight into the ways in which teachers as professionals are prepared and the ways in

which “teaching” is created as an object, how “teacher” is constructed as a subject, and how those objectifications and subjectifications are used to govern teacher education. Consequently, any analysis of the currently shifting space between the roles of the State and of teacher education would be facilitated by:

- a) Focusing on one of the new instruments employed to assess and measure the performance and conduct of preservice teachers at the point of teacher licensure;
- b) Analyzing State-generated policy documents that govern teacher licensure to notice how objects related to teaching are constructed in those documents;
- c) Examining how teachers are governed and how subjects related to teachers are constructed within and by such policy documents;
- d) Calling attention to the constructed nature of these policy objects and subjects, and exploring ways that this noticing can support the rejection of external governance of teacher education and teachers and maintain professional autonomy.

Within the context of education and teacher education, it is possible to analyze the governmentality that is used to govern teachers and teacher educators, and it is also possible to examine the governmentalities that teachers and teacher educators cultivate in their students. For this study, I plan to examine the former, rather than the latter. I will do this by exploring the governmentalities that are built within the focal policy, which greatly influence the structure teacher licensure. This is a valuable endeavor because it calls attention to ways that the State regulates the conduct of teacher education, which has a cascading effect on teachers and teacher educators, who in turn regulate the conduct

of students, who in turn cultivate governmentalities as children that they then bring with them as they age, eventually altering what is taken to be normal, natural, and necessary in society. Doing this work is important because the way we presently approach policy in education does not typically allow for the revealing, reimagining, or rejecting of governmentality because it focuses on “problems” and “solutions” in ways that deprofessionalize or negotiate terms of deprofessionalization. The approach proposed here works against forms of analysis that presume that problems are real, require application of ideological or technical logic to understand, or address and privilege the goal of creating logical solutions to identified problems. In contrast, a poststructural approach to policy analysis understands problems to be created representations, which require rejection and/or deconstruction of logic and privilege the goal of dis-solution of governmentality(ies) to work toward professional autonomy and self-governance.

To accomplish this, I employed a poststructural policy analysis method, the WPR Approach (Bacchi & Goodwin, 2016), as a way to examine governmentality within one particular policy proposal made by the state of New Jersey that called for the implementation of a new teacher education assessment as a prerequisite for state licensure. The WPR approach, which stands for “What is the Problem Represented to be,” is more fully explained in the methods section, but it essentially focuses on the ways in which problems and problematization are *created* in society based on how they are portrayed within policy documents. Bacchi and Goodwin argue that understanding that policy documents create the problems they purportedly address helps to reveal the governmentalities that they presume and promote. It is my hope that this analysis

provides useful insight into the ways that the rights and responsibilities of the State and teacher education are contested, conveyed, and constructed by policy documents, and that it offers a new way to view, understand, and resist governmentalities that deprofessionalize teacher education.

## CHAPTER TWO

### A POSTSTRUCTURALIST RE-VIEWING OF LITERATURE

In this section, I expand upon Bacchi and Goodwin's (2016) parsing of problematization in policy analysis and describe four specific types of problematization (direct, indirect, interpretive/rational, and representational/poststructural), in order to offer an additional way of viewing teacher education policy from a poststructuralist standpoint. In the balance of the first section, I discuss how poststructural problematization relates to governmentality, policy, and education, and how a poststructural lens allows for a critical approach to reading and resisting governance.

Additionally, this section is immediately followed by a section on the methodological considerations of the WPR Approach, which offers a framework for enacting a critical poststructuralist approach to policy analysis, and which offers more detailed suggestions about how poststructural problematization could provide meaningful and currently lacking insight for teacher education.

#### **Problematization: An Overview**

Problematization, as both a term and a process, exists and is understood in multiple ways within writings about education, but is not necessarily itself a well-unpacked concept in education literature. As such, the concept of problematization is often overlooked in favor of analyzing the focal "problem," the perceived causes or proposed solutions to the problem, differing perspectives that inform the problem or understand the problem in different ways, etc. Though it is not itself well-unpacked as a concept or practice in the wider literature, problematization is critical to policy analysis

because, as Osborne (1997) notes, “policy cannot get to work without first problematizing its territory” (p. 174). More than that, Rose and Miller (1992) argue that government is itself a “problematizing activity” (p. 181). Together with Foucault’s notion that government is regulation of “conduct of conduct” (1982, pp. 220-221), it is possible to understand government as a problematizing activity that involves the regulation of behavior (conduct of conduct), often through policy, which “cannot get to work” (Osborne, 1997, p. 174) until it has problematized the area it is attempting to govern. This mirrors Bletsas’s (2012) notion that governing occurs through forms of problematization, and that government policies take cultural products (e.g., opinions, perspectives, and assumptions) and “make ‘facts’ and make ‘truths’” (p. 29), which in turn can be used to justify the “imposition of limitations on what can be said and what can be thought” (Bacchi, 1999, p. 45 as cited in Bletsas, 2012, p. 29). This section will address some of the ways that poststructuralism interacts with problematization, in an attempt to demonstrate how policy can documents *create* rather than *reflect* problems.

In order to begin to better unpack problematization, it is helpful to have a basic understanding of the etymology of the word “problem.” Doing so lends helpful insight into the genealogy and meaning of problematization by showing how governments use policies and policy proposals to “put forth” and formalize particular issues, worldviews, and forms of rationality. The etymological root of the word *problem* combines the prefix *pro-* (forward) and the Greek root *ballien* (to throw); in other words, etymologically speaking, *problem* contains elements that suggest that a problem is that which is thrown (or put/positioned) forward (of other things/concerns). When the suffix *-atize* is added to

a word, it denotes the action of doing. Similarly, *problematizing* occurs when one goes through or enacts the process of throwing (or putting) something forward. Consequently, from this perspective, the word *problematize* is the process of throwing (or putting) something forward. Adding the suffix *-ation* to *problematize* brings the focus onto the outcome of doing the action of throwing (or putting) something forward. In other words, adding *-atization* to *problem* means that *problematization* can be understood as the outcome of the process of throwing (or putting) something forward. In each of these cases, the root of *problem* hints at something metaphorically “thrown forward” or “put forth,” which may lead to its identification or render it more visible, allow it to be named, privilege it over other things not thrown forward, or in some way draw additional attention to that thing by making it more prominent. While this basic etymological definition does not dictate how the word is used in practice (to believe that it did would be to fall prey to the etymological fallacy), it does lend some insight into the concepts contained within the construction of the term.

In the context of a poststructuralist approach, the ‘something’ being thrown forward in each of these instances is often either a “subject” or an “object.” Foucault (1990, 1992) placed a strong emphasis on the importance of the “deregulated” or “free” self, who is free from external and undue control or governance. According to Foucault (1964), dividing people into categories is one of the processes that allows for individuals to become “subjects” whose dominance and control is “justifiable” according to the State. By naming and labeling an individual person as a *specific kind of thing* (e.g., a teacher, a student, a parent) through the “meticulous rituals of power” (Dreyfus & Rabinow, 1983,



p. 110) that comprise government (such as policy documentation), that individual is made into a subject understood to be a fixed construct with particular features and characteristics (Bacchi & Goodwin, 2016), regardless of whether or not that individual displayed those characteristics prior to being labeled (i.e., they are presumed to have those characteristics [e.g., a certain appearance, particular behaviors or tendencies, existence within specific locations, etc.] by association with the subjectifying category, whether or not that is accurate to their lived realities). Since they are now presumed to display certain characteristics that are either positive or negative, subjects are beholden to expectations, regulations, and control of behavior that seems justifiable because of the internalized governmentalities in society (e.g., “all teachers should ...,” “good students always...,” “no *real* parent would ever...”). Similarly, naming and labeling things or concepts as particular “objects” allows for similar, seemingly justified control and governance. “Objects” in this view are named things (as opposed to people), “so labeled because they have characteristics in common and hence form a category” (Bacchi & Goodwin, 2016, p. 84; cf. Lakoff, 1987). Through both subjectification (the process by which a person becomes a subject) and objectification (the process by which a thing becomes an object), people and things become singular and fixed (rather than fluid, dynamic, and contradictory), and external control and dominance become seemingly justified, natural, and normal (Bacchi & Goodwin, 2016).

Foucault did not place as strong of an emphasis on the distinction between *discursive* subjects and objects as others prior to or following him (McHoul & Grace, 1997). He was, however, concerned with the processes, or “dividing practices”

(Foucault, 1964; cf. Bacchi & Goodwin, 2016; Madigan, 1992), by which individuals and concepts are sorted and controlled, and discussed subjects and objects in terms of *governance*, rather than discourse. Foucault studied a number of different types of subjects, including the poor and individuals who had been institutionalized due to perceptions of their mental state. Such groups, he asserted, were turned into controllable subjects, whose governance and control seemed reasonable because of the way that they were positioned and described by others (Foucault, 1964). Policy plays an important role in the processes of subjectification and objectification because it formalizes, normalizes, codifies, distributes, and justifies the static, mono-polar vision of subjects and objects, making them not only desirable or undesirable, problematic or unproblematic, but also legal or illegal, enforceable or unenforceable. Through these processes, individuals may also lose rights, subjecting them to “justified” control by the State.

Within the context of government, the problematizing codified/created by/in policy documents instantiates particular representations of issues as more important, more real, more pressing, or more natural than others in ways that are often tied to reward or punishment. In other words, policies make a given perspective official, thus obviating, negating, or marginalizing other ways of representing, understanding, or rejecting that issue. The WPR Approach is one attempt to enact a poststructural stance to highlighting that policy portrayals are not the only way of understanding. Instead, the WPR Approach intends to call attention to the official problematizations in policies and policy proposals as subjective perspectives that have been “put forth” or “thrown forward” by the State, and not as reflections of “Truth.” Furthermore, the WPR Approach

suggests that policies and policy proposals “create” problems in the world by representing issues in particular ways that appear to be “identifying” or “naming” an issue as it is rather than “representing” an issue in a particular way, which causes that issue to lose much of its perspective and political nature (cf. strong and weak myths in Barthes, 1972). Consequently, a political and constructed representation is presented as the politically-neutral, as well as an inevitable and natural (rather than constructed) by-product of history. Bacchi and Goodwin (2016) further state that through this process of documentation, a policy perspective *becomes* a real and consequential problem.

Bacchi and Goodwin (2016) note that in the WPR Approach, they use the term problematization in two ways: 1) “to refer to the products of governmental practices, that is how issues are problematized”; and 2) “to signal a form of critical analysis, putting something into question” (p. 16). For the purposes of this discussion, I consider the first form of problematizing, “problematizing that divides and names” and the second “problematizing that rationalizes” (each further explained in their own section below). Bearing the etymological history of the word “problematization” in mind, I have further divided each of these two types of problematization to show how they “throw forward” particular subjects, objects, and rationalities in ways that make those subjects, objects, and rationalities, more real and consequential than other perspectives. This subdivision has resulted in three types of problematization, each with related, but differing meanings, implications, and assumptions. I have done this in order to more specifically show how problematizations occur or could occur in education, particularly in ways that

deprofessionalize teacher education, and how each type relates to the WPR Approach and to poststructuralist considerations.

Specifically, I have divided problematization in education in the following three ways: problematization that creates subjects, problematization that creates objects, and problematization that creates rationalities. Problematizations that create subjects and objects together comprise problematization that divides and names, because both identify and name a problem in ways that creates a controllable category of either people or things. As the name would suggest, problematizing that rationalizes attempts to examine, explain, critique, theorize, or question how a problem gets represented, comes into being, or functions in the world. From a poststructuralist perspective, however, problematization that rationalizes does not only attempt to trace the logic behind an observed problem, but also *creates* the logic necessary to understand and accept that the problem, as it is presented, as real, true, reasonable, and the “natural” outcome of history and context.

### **Problematizations that Subjectify or Objectify**

Problematizations that create subjects and objects share some similarities, in particular, their function in identifying, defining, and describing problems. Though they share many similarities, the first creates subjects by dividing people (e.g., teachers), based on shared (or perceived to be shared) characteristics (such as their role, dress or appearance, associated objects [e.g., textbooks], or “places” where they are found [even metonymously symbolic places, e.g., school]). Once defined as subjects, it becomes possible to name that entire category of subjects as a problem, and then to *subject* those

individuals to particular forms of treatment or control, based on the way that they are now understood to be a problem. Similarly, objects, which can either be tangible or intangible (e.g., pedagogy), conceptual (e.g., sexism), or otherwise non-observable, can be created in a similar way, using shared (or perceived to be shared) factors as a way to create a group. Once grouped, the objects, just as the subjects previously discussed, are then governable based on how they have been presented, rather than the multiple, contradictory, dynamic, plural, and partial ways they are, were, or could be.

### **Problematization that Creates Subjects**

This form of problematization occurs when one locates problems directly in people or categories of people, who are categorized based on their characteristics (e.g., age, race), perceived characteristics (e.g., stereotypical beliefs about certain people's actions), roles (e.g., teacher, student), or locations (or by association with places that metonymically represent people, e.g., when "school" stands in for a known person or people at the school, as in the sentence "the school sent home a permission slip"). In this form of problematization, these subjects (e.g., young people, "white" men, teachers, etc.) are then labeled as problems that are the explicit cause of issues and undesired outcomes (e.g., failing schools, unproductive economy, etc.). In this form of problematizing, certain types of people are problems and are themselves causally responsible for undesirable outcomes (e.g., bad teachers [the subject *cum* problem] cause failing schools [outcome]). In other words, problematization that creates subjects is the process of making a category of people (i.e., creating a subject) and then "throwing it forward" to present those in that category as the cause of an issue (i.e., making a problem), which

allows for those subjects to be visible, sortable, evaluable, and controllable (i.e., justifying, requiring, and almost demanding governance).

In a poststructuralist view, these subjects “are understood to be emergent or in process, shaped in ongoing interactions with discourses and other practices, rather than founding or unchanging types of being who possess a fixed human essence or nature” (Bacchi & Goodwin, 2016, p. 4), which contrasts with the notion that these “subjects” are merely found or identified, which is a common presumption or stance in policy and policy analysis (Bacchi & Goodwin, 2016). In contrast, a poststructuralist approach would suggest that these subjects are *created* in a particular way (e.g., old, “white,” etc.), and categories are made and communicated through the way that they are applied to individuals, rather than “natural” categories into which individuals can be sorted. In service to this created representation, “evidence” generated by whoever is doing the problematizing, serves as justification for the labeling of the individuals as a ruleable subject and a problem in need of a solution, and that justification may be applied after the person/people has/have already been categorized as a subject or represented as a problem. Solutions to problematizations that subjectify would most likely be direct and may be as simple as the suggestion to remove or eliminate the subject, thus removing the problem.

For example, Bacchi and Goodwin (2016) use the example of obese individuals to illustrate subjectification and the labeling of individuals as a problem. In this instance, the subject “obese people” is created; whereas previously, individuals may have been lighter or heavier, the category of “obese” makes it so that individuals may now be placed into that category (i.e., rather than just people, they are now obese people, based on their

score on a particular measure - in this case, body mass index or BMI). Moreover, other people may fall outside of that category (i.e., non-obese people, also determined by BMI), and both groups can now be governed or controlled based on that subjectification. In this instance, the problem is located within obese people, and they themselves are represented as a problem in need of monitoring, punishment, or at the very least, a solution (for more examples, see also Valverde, 1998).

Within this example, obese people might be seen as an unfair drain on insurance groups, and, as a solution to this problem, a hypothetical policy might be created that allows insurance groups to withhold treatment or coverage from obese people, or increase their costs. Consequently, the subjectification of individuals as “obese people” is represented as a problem that “rationally” allows for discrimination of coverage in a way that was not possible on a large scale prior to the creation of the category, its measurement with a particular instrument, and its instantiation in policy. All of those factors allow for a form of control, governance, and discrimination that was not possible prior to the subjectification of “obese people” and the placing of individuals into that created category.

To ease the description of subsequent forms of problematization, this example about categorization of obese people will be used throughout. Specifically, the subjectification of “obese people” is facilitated by the creation of the object “obesity,” which will be discussed next, and by the rationalities and explanations of the causes of obesity after that.

### **Problematizing that Creates Objects**

Problematization that creates objects identifies and names underlying, often intangible problems via (often) observable effects they supposedly cause. The categorization of objects (e.g., addiction, illiteracy, obesity, insanity) as problems allows for justified control of individuals associated with those objects as a way of “order maintaining” (Bacchi & Goodwin, 2016, p. 6). In this form of problematizing, particular objects are created and represented as problems that cause undesirable outcomes, which differs from problematizing that creates subjects, in which categories of people are problems that cause undesirable outcomes. In this form of problematization, evidence justifies the existence of the underlying object that is a problem and may contribute to better “naming” of the underlying problem from the perspective of whoever is doing the problematizing.

Returning to the example of obese people, creating categories of people is often accompanied by the creation of a corresponding object, in this case “obesity.” Objects created in policies often facilitate indirect control of people by allowing corresponding policy to be focused on an object (e.g., a construct, concept, or idea), rather than a subject (i.e., a person or group of people). Despite a policy’s focus on an object, “addressing” the problematic object often seemingly justifies the supervision, regulation, or policing of people. Obesity, in the example of obese people, is an object that was created in relation to obese people, or “the obese,” on whose classification it relies to exist. In other words, “obesity” as a concept, requires definition and attribution to exist, and how it is defined (e.g., by a particular BMI score) determines who is or is not obese. Altering the policy



(e.g., by lowering the required BMI to be classified as “obese”) would result in more obese people, despite the fact that only the policy has changed and nothing about the people has changed. By (re)setting the characteristics of obesity ([re]defining it in a particular way, using a particular measure), the policy positioned as *addressing* obesity in reality, is in actuality, *creating* it in reality in a certain way and assigning it as a characteristic to particular individuals in society. As a result, the object of “obesity” and its definition and formalization within policy, helps to *create* obesity as a problematic characteristic or “condition” that eventually allows for the “justifiable” control of individuals.

The objectification of obesity, that is, the creation of obesity as a policy object, mirrors and compliments the creation of obese people as a subject and can function as a proxy for or pathway to controlling obese people. Much like the strawman fallacy in which an argument is targeted at a weaker proposition rather than at an opponent’s argument, the creation of an object allows for the control of individuals and their behavior through a construction that is easier to control and justify than direct control of people. In the same way that it is easier to legislate control of or lobby an argument against “obesity” than a large set of ungrouped people, it is often easier for a policy to create and control an object than a subject or an ungrouped set of citizens.

**How subjects and objects are used in policy proposals.** This dissertation seeks to unpack one policy to find exemplars of objectification and subjectification to demonstrate *how* objects and subjects are created in/by policy. A multitude of critical stances exist for imputing, tracing, or revealing *why* objects and subjects are created.

Those analytic and/or critical approaches provide frameworks for tracing, naming, or refuting the ideologies that might cause individuals to create these problematizations, however the post-humanist underpinnings of the WPR place those types of analysis beyond the scope of this particular work.

Even without attempting to understand the motivations that result in policies problematizing in particular ways and for particular purposes, examining how a policy proposes solutions to the problems it creates/identifies provides insight into where the policy is locating the problem (in the aforementioned example, either targeting remediation at the *object* “obesity” or *subject* “obese people”). This, in turn, helps to reveal how the problem is being positioned, which lays the foundation for analysis that seeks to notice at what/whom the “solutions” are targeted. Tracing the location of problematizations helps to show what/who the policy is attempting to control, and in particular, the constructed nature of the justifications for control, and highlights the intrinsic relationship between policy and control, while setting aside the degree to which that control might be “reasonable.” Moreover, this post-humanist approach helps to focus analysis at the level of structures of control, which aligns with a poststructuralist method that attends to and lobbies its critiques against the structures that create and bound society, rather than individuals. This attention to structures not only reflects the theoretical underpinnings of this dissertation, but also helps to safeguard the analysis from straying into the types of interpretivist analysis that may accidentally participate in the construction of rationalities that “help” develop “better” policies.

Returning to the previous example to further explore how subjects and objects are used to control individuals in society, a policy problematizing obese people might suggest that one solution could be to limit those individuals' ability to use government assistance or funding to buy certain foods deemed "unhealthy." In this case, the solution of restricting the choices that are available to individuals determined to be obese people reveals that part of the problematization of obese people is that they are presumed to make bad food choices and thus the "real problem" can be solved by restricting their freedom to purchase any food item. As shown in this example, the way that the policy proposed solutions lends additional insight into the problematizations contained within the policy, in particular those not explicitly spelled out or identified as a problem, restricting the ways that are possible or acceptable to think about the problem to those represented by the policy. This is not to say that alternative conceptualizations are impossible, however alternative problematizations or contestations would most likely be made in response to the initial problematization, which implicitly acquiesces to some aspects of the reality of the problem as presented by the policy. This implicit acceptance can occur in many forms, such as use of the initial problematization's terminology, acceptance of the rationality behind the existence of the problem, renegotiating the measures by which the problem "should" be assessed, or how the problem (accepted as real) "should" be addressed.

In contrast to a policy focused on the subject of obese people, a policy problematizing obesity as an object might try to show how obesity is the result of predatory advertising of products that position unhealthy foods as desirable, fun, or

“cool” foods. In doing so, such a policy might propose that restrictions on advertising are the appropriate way to “combat obesity,” thus using the object of obesity as a way to justify control of advertising and advertisers.

In both of these first two forms of problematizing, a “dividing practice” (Foucault, 1964) of categorization is occurring, which results in the creation of either a subject or as an object. In each, the problem (the “thing that is thrown forward” or focused on) varies, but the outcome is the same — categorization that allows for seemingly justifiable control and governance. That said, attending to and noticing the ways in which a policy presents a problem and proposes solutions lends insight into the subjects and objects created by that policy.

The creation of subjects and objects is inherently a part of policy proposals and categorical definitions, although it often goes unnoticed or uncontested. Even in the example of obesity offered above, the object “unhealthy foods” was subtly created in relation to obesity. This objectification created the presumed categories of healthy and unhealthy foods, constructing the cause of the object of obesity in relation to and as the result of consuming unhealthy foods. Furthermore, this suggests that obesity is a problem that necessitates or justifies control, and that the control can be attained by regulating the degree of healthy and unhealthy foods available for obese people to purchase. The inevitable subjectification and objectification that occurs in policies, policy proposals, and policy analyses helps to highlight the benefit of alternative methods of criticality. This approach is less concerned with the veracity of claims about the degree to which foods would be considered healthy or unhealthy, which research or

evidence was provided to support the categorizations and to whose benefit, by which measures healthy/unhealthy foods would be assessed, or similar considerations that might comprise the foundation of more traditional forms of analysis. Instead, this form of poststructural analysis posits that questioning the validity, reliability, appropriacy, or accuracy of such considerations, offering “better” alternatives, or negotiating the “right” way of writing the policy ultimately contribute to the State’s ability to create docile citizens. In contrast, alternative methods, such as poststructural critique, offer new pathways to resistance because they focus on rejecting oppressive problematizations within State policies. This rejection refuses to participate in critique in ways that contribute to renegotiating, using, explaining, rationalizing, or inadvertently more deeply instantiating the subject/objectifications created in/by policies, and it demands that the focus of resistance begin by questioning the inevitability and necessity of the policy-producing institution to control individuals and their behavior through the use of constructed policy objects.

In the example, unhealthy foods are not defined, but they are positioned as the cause of obesity and are presumed to be known to the reader. Some forms of policy critique or analysis might suggest that so-called unhealthy foods should be defined, that exercise or genetics should be taken into account when determining the causes of obesity, or which alternative measures to BMI would constitute more meaningful ways to assess obesity. In each of these instances, the analyses or critiques utilize, and thus more deeply ingrain, the object of obesity, thus making it more “real” and negotiating the terms on which it can be considered a justifiable construct. What these forms of analysis miss,

however, is that the policy creates and uses the object “obesity” in ways that erode the ability for individuals to act freely and without external oversight and regulation of what they are or are not able to purchase and consume, which identities they may or may not enact (according to others or to their own governing mentalities), and what other conditions might allow them to be exempt from the controlling factors associated with the stigmatized object (e.g., the ability to pay a soda tax intended to “fight obesity” is negated by ability to pay the tax without it causing detriment to one’s existence). Regardless of the degree to which the control of “obese” subjects was intended or “justified,” the policy creates a reality in which the control of those subjects is (or appears) necessary, normal, natural, and neutral.

Another example, which highlights the role of measurement in objectification, involves recent updates to the guidelines for the diagnosis of high blood pressure. In 2017, the American Heart Association, American College of Cardiology, and nine other professional organizations redrew guidelines for high blood pressure. An article titled, “Nearly half of Americans now have high blood pressure, based on new guidelines” (Scutti, 2017), highlights the role that the redefined guidelines play in the shaping of the object of high blood pressure. Since objects typically require a means of measurement as a way to differentiate and divide, redefining the instruments by which an object is evaluated simultaneously recreates the reality supposedly assessed by that measure.

(Re-)Objectifying an object similarly (re-)subjectifies and also generates issues that also lead to a corresponding (re-)creation of governmentality. In the example of high

blood pressure, the article notes, “tens of millions more Americans now have high blood pressure” (Scutti, 2017, n.p.). Although nothing about those individuals changed, changing the cut-points for the measure of the object of high blood pressure resulted in tens of millions of individuals suddenly becoming subjectified by that object. Dr. William White, a professor of cardiology quoted in the article, is quoted as commenting that both the public and practitioners are “going to be a little shocked or taken aback by a diagnosis of Stage 1 hypertension with a blood pressure of 130/80, which historically has been considered a normal, well-controlled blood pressure” (White, as cited in Scutti, 2017, n.p.). As a result of the changes, previously unregulated and unlabeled individuals will now be coached into “watching [their] salt, exercising more regularly, relaxing, getting a proper amount of sleep, eating a little more potassium-rich fruits and vegetables” and more (White, as cited in Scutti, 2017, n.p.). In short, the redefining of a measure altered an object, which in turn subjectified more and different individuals, which then justified the controlling of their behaviors and bodies in a way that is positioned as being for their own good.

None of this is to say whether or not these changes are “good” or not, but rather to notice both the constructed nature of categories and “reality” (i.e., that those individuals “have” high blood pressure is a constructed reality based on a particular measure, not an “objective” or “natural” Truth [note the capital “T”, cf. Segal, 2006]), and to recognize and question the role of particular measures and instruments in that process. Similarly, this type of work seeks to open up space to engage in conversation about whether or not we wish to continue to act as though those policy objectifications and subjectifications

*reflect* “Truths” in reality rather than *create* “truths” as real in ways that justify the control of individuals.

The ability to redefine ostensibly “objective” objects, either by altering a measure or cut-points for a measure, highlights both the role of measurements in objectification and subjectification, as well as the “non-objective,” constructed nature of such problematizations. Such alterations serve as justification for the control of individuals and their behavior—in this case, drastically expanding the pool of individuals for whom lifestyle changes are now necessary. The very fact that an object can be redefined calls into question the inevitability, reality, fixedness, and normalcy of that object. Similarly, the categorizations and subjectifications that result from an object being ascribed and attributed to individuals is similarly flexible, yet the categories that such definitions create represent themselves as unchanging, obvious, and necessary.

The ability for a profession to redefine its measures, objects, and subjects is a major professional freedom. In the example above, a collection of professional organizations worked together to redraw its guidelines, which in turn alters the behavior of the practitioners within that profession. When measures by which objects are defined and subjects created are (re-)set by entities (such as the State) from outside of the profession, those outside entities effectively not only alter or impose a measure, they also gain the ability to create and control the objects, subjects, and practitioners beholden to those measures. In essence, altering either a measure, object, or subject results in the ability to control categories of individuals and their behavior in a way that often goes unseen, or is taken to be reasonable and natural.



It is important to note that to question the status of categories as subjects or objects is not to question their existence, but rather to “challeng[e] their existence as fixed” (Bacchi & Goodwin, 2016, p. 84; cf. Chia, 1996, pp. 32-33). Thus, the task of poststructural policy analysis becomes a critical noticing and questioning of the way that subjects and objects are created in particular ways within a policy document, at a particular point in time. This noticing and questioning hints at the goal of “de-inevitabilizing” the representations of policy documents. This stands in contrast to other, more common forms of policy analysis in education, which often work toward ends such as challenging the accuracy, applicability, or appropriacy of the subjects or objects in a given policy, uncovering the limitations or unspoken beneficiaries of particular policy representations, identifying which perspectives are/are not present in the policy problematizations, etc. Moreover, it is insufficient to only question problematizations; it is also necessary to question the institutions responsible for problematizing objects and subjects, as well as the measures by which those objects and subjects are defined, because the entity that sets the measure effectively gains the ability to control the problematizations and the seemingly justified control of individuals created by that measure. These various ends, which in some way focus on and contribute to (re)examining, (re)explaining, or (re)justifying policy problematizations, are common goals or approaches of critical policy analysis, and will be described as forms of problematization that rationalize.

### **Problematizations that Rationalize**

Problematizations that rationalize comprise analyses, theorizations, or explanations of a policy problem, such as what a given problem entails, how or why it came to be, whom it may serve, why it continues to exist. These rationalizations presume a problem is real and exists, and they draw on an “interpretive analytic tradition” that privileges the use of rhetoric and persuasion to convincingly outline an explanation for a given problem and its proposed solutions (Bacchi & Goodwin, 2016, p. 28).

Simultaneously, these approaches tend to critique the realness and rationality of other perspectives by identifying, refuting, and showing the limitations of competing views (Bacchi & Goodwin, 2016). Interpretive approaches typically attempt to provide the most accurate and systematic retelling or documenting of a problem, so that it can be understood as real, pressing, and solvable using a particular solution that is similarly logical, necessary, and natural. Such problematizations require rhetoric and persuasion to convincingly claim that their explanations of a given problem best reflect the most accurate, most “real,” and most complete version of that problem. By convincingly demonstrating that their explanation takes into account the most and best factors affecting and causing the problem, the rationalizations can therefore claim to have the best vantage point from which to offer the best, most necessary, and most attainable solution to the problem (Bacchi & Goodwin, 2016).

This view, however, demonstrates a focus on interpreting reality, rather than adopting the more poststructuralist view that such rationalizations are “more generally constitutive of reality” (Bacchi & Goodwin, 2016, p. 28; cf. Clegg & Haugaard, 2009) and therefore do not *reflect* rationality but rather *create* it. In other words, these

problematizations do not identify and describe the inherent rationality and logic behind a problem that exists in the world; instead they generate and disseminate a seemingly logical representation of a problem. These “socially produced forms of knowledge” then “set limits upon what it is possible to think, write, or speak about [a given problem]” (Bacchi & Goodwin, 2016, p. 35). These perspective-bound portrayals result in understandings of problems that seemingly point to a homological, deductive logic that non-categorically states “this, then, is what needs to be done” (Foucault, 1991, p. 84). As a result, explanations that do not fit the accepted problematization’s rationality then can be understood to be irrational, while those that adhere to the logic offered by the proposed problematization can be deemed rational. In this way, problematizations that rationalize do not, as they may seem to, find or document the rationality of a problem, but rather, construct the rationality necessary to accept the problematization—they *produce* the rationality that they purportedly mirror.

For example, a hypothetical health department funded study ostensibly examining obesity (outlining causes of obesity, how it comes to be, the factors that make obesity more or less common, the variety of ways that it can be prevented, the negative outcomes it causes, etc.), may actually contribute to making obesity (a constructed object) far more “real.” The more explicit the study is about obesity’s causes, the more rational obesity seems, not only as an abstract construct, but as something that individuals begin to understand and accept as tangible, and therefore real, rational, normal, and undesirable/dangerous. In effect, the study helps to strengthen the object obesity, makes it more real in people’s minds, and at the same time co-constructs the rationality that

makes obesity something that is reasonably concerning, perhaps to the extent that it seemingly makes sense to control people's behavior to prevent or alleviate it.

Although not the same as policy, studies that examine objects, such the hypothetical study of obesity in this example, often serve as the justification for a policy or a particular proposal within a policy. Similarly, Bacchi and Goodwin (2016) position policy analyses and critiques as locations that make, distribute, and normalize problematizations that create subjects, objects, and rationalities. Research studies and non-poststructuralist policy analyses often supply, theorize, or attempt to uncover/interpret rationalities within policies, but they do so in ways that reinforce or create the appearance of "logical" and "natural" connections between constructed objects and individuals or their behaviors. These rationalities are then often used to create new and "better" policies that take these findings or critiques into account. Consequently, the concerns of the research or policy critique are addressed, but the governance enacted by the policy is not; the terms of control have been accepted and are seen as rational.

Much like policy, research and policy agendas and analyses participate in the construction of objects, subjects, and rationalities in similar ways, and can likewise be examined using poststructural methods. However, they are not the focus of my work because they do not result in the direct policing and justification of control of people in the same way that policies do. Rather, research studies and policy analyses tend to contribute to State governance indirectly through the development or negotiation of governmentalities in society, but not necessarily through government (e.g., when research makes it to the public consciousness and people accept what has been found; when new

policies take into account the critiques offered by policy analyses) or through their formal incorporation into a policy.

Regardless of where they occur (e.g., policy, research, policy analyses), problematizations that rationalize contribute to building governmentalities that justify control by outlining and disseminating “logical” ways of understanding and reasons for accepting governance. This can occur in ways that look like the rejection of governance through policy, such as describing conditions that would make a proposed solution more “fair” or leveling a counterargument naming “real” problems overlooked in the initial policy. However, in doing so, these forms of policy analysis lodge their critique at the level of the problematization, missing the opportunity to reject larger structures and mechanisms of governance. They often do this by describing and distributing apparently superior answers to what a problem is, and how individuals or government must act in response in order to solve it, by laying out seemingly logical ways of understanding problems and correspondingly necessary solutions. At the same time, these forms of critique tend to offer substantial evidence proving or supporting their assertion, in addition to providing and detailing the logic justifying their conclusions. However, as a result, those approaches tend to reject, (re)negotiate, or reveal *problems* and *problematizations* within policy, rather than the *governance* and *governmentalities* that policy creates.

Consequently, these forms of policy analysis can miss opportunities to resist governmentality, governance, or control, instead often neatly outlining the terms or conditions by which subjugation would be acceptable or accepted. Since a

poststructuralist viewpoint also posits creation of “justified” control of individuals as the ultimate purpose and sole power of governance, critiques that engage with policy problems or their proposed solutions (or their terms, rationalities, etc.) but fall short of rejecting the governance co-constructed through problematizations, actually *support* rather than *reject* governance. From a poststructuralist perspective, this creates a seemingly paradoxical situation in which policy analysis and critique that focuses on offering better or alternative *solutions* to problems, rather than *dissolutions* of governmentalities, may inadvertently offer theoretical perspectives that make governance and control seem like the inevitable, natural, or normal outcome of history and contextual factors.

Bearing that perspective in mind, the following section describes the poststructural analysis method I used to examine problematizations within a specific teacher education policy proposal. It is my hope that my articulation of this method both explored underlying assumptions within a given policy document as a way to raise awareness of how policies shape lived realities in teacher education, and provided an entry point for teacher educators to conversations of resistance to and rejection of undue external governance.

### CHAPTER THREE

#### CRITICAL POSTSTRUCTURALIST METHODOLOGY

In this study, I attempted to apply a relatively uncommon approach to analyzing teacher education policy—critical poststructural policy analysis. While critical policy analysis and poststructural analysis both have traditions within education and teacher education (see also Peters, 1996; Rogers, 2011), applying analysis that combines features of both critical analysis and poststructural analysis is comparatively rare, and “in the field of policy research and analysis [poststructuralism] occupies a less well-articulated and more contested position” (Bacchi & Goodwin, 2016, p. 4).

This study employed qualitative methodological approaches because they best allowed for the construction of a complex understanding of the issue at hand (Cresswell, 2015), and because they pushed back against positivist interpretations of research common to educational policy analysis (Gleason, 2017). In contrast to more quantitative methods, which tend to be focused on understanding “how things are,” qualitative research is often better suited to examining the multiple, partial, and contradictory ways that “things happen,” while providing researchers opportunities to consider “how these ‘things’ have come to be and continue to be ‘done’ or ‘made’ on an ongoing basis” (Bacchi & Goodwin, 2016, p. 14).

Furthermore, many forms of teacher education policy analysis employ interpretivist approaches, which attempt to explain the intent behind policies, and both to work toward and build common understanding (Bacchi & Goodwin, 2016). In contrast, critical poststructural policy analysis attempts to *trouble* common understandings, rather

than work toward them (Bacchi & Goodwin, 2016). Destabilizing both common approaches to policy analysis, as well as the very problematizations and assumptions upon which such policies rely, allows critical poststructural policy analyses to “interrogate, compare, and rethink common forms of problematization in policies and policy proposals” and to “[open] up a critical space to reflect on how governing takes place and with what effects for those so governed” (Bacchi & Goodwin, 2016, p. 40). In essence, critical poststructuralist policy analysis methods of this type attempt to offer a way to see and resist external governance by calling into question the fixedness and realness of policy problematizations and by noticing and calling attention to their constructed nature.

### **Study Purpose and Research Questions**

In order to better understand the role that policy plays in the deprofessionalization of teacher education, I initially adopted a critical poststructural policy analysis method to unpack and examine problematizations in a current and highly influential teacher education policy proposal. This poststructural approach was intended to participate in the unmaking of problematizations in policy proposals, which is one step toward revealing and resisting external governance. Specifically, this study was framed by the following research questions:

1. How does the focal teacher education policy proposal represent/problematize teacher education?
  - a. How does the representation/problematization of teacher education subjectify teacher educators?



2. How does the focal teacher education policy proposal represent/problematicize licensure requirements?
  - a. How does the representation/problematicization of licensure requirements describe or alter the roles of the state, teacher education programs, and candidates?

### **Policy Documents as Data**

In particular, critical forms of poststructuralism attend to the ways in which politics and/of power are rendered invisible making the situations and choices of the present appear to be the sole and inevitable outcome of historical condition and context, rather than as the result of particular mechanisms, actions, decisions, definitions, and representations. As mentioned previously, Bacchi and Goodwin (2016) call this process the “de-inevitabilization” of the present, and they consider it, in itself, to be a critical act (p. 47).

Through efforts to de-inevitabilize the present, these approaches “encourage a rethinking of specific policies and programs that rest on such unquestioned premises” (Bacchi & Goodwin, 2016, p. 49), which resonates with other methods that attempt to reveal the “past as a strange land” (Dean, 1999, p. 44) or make the familiar strange and the strange familiar (Eliot, 1950; cf. Spiro, 1990). In other words, within the context of policy analysis, poststructuralist approaches do this by attending to a wide variety of unexamined practices, discourses, and knowledges, with the goal of rendering that which appears certain to be less-certain, and that which appears to be uncertain to be more-certain.

Poststructural policy analyses differ from other, more popular approaches because they attend to the *construction* of problems, rather than to the *solving* of problems or to the creation of shared understanding of how and why problems might exist. Consequently, critical poststructuralist policy analyses provide a different form of information about “problems” than the more common rationalist approaches (e.g., Jann & Wegrich, 2007; Lasswell, 1956; Lindblom, Cohen, & Warfield, 1980; Pawson, Greenhalgh, Harvey, & Walshe, 2004; Rein & Schon, 1977; Simon, 1961) which attempt to solve “real” problems, and interpretive approaches (Hoppe, 2002a, 2002b; Kingdon, 2003; Lancaster, Ritter, & Colebatch, 2014), which attempt to understand how policy actors “*shape understandings of problems*” (Bacchi & Goodwin, 2016, p. 39, emphasis in original). Since critical poststructural approaches remain uncommon and arguably underutilized within teacher education, they offer teacher education a “new” and valuable tool to examine policy mandates and policy proposals and to see otherwise overlooked glimpses into the creative power of policy.

### **Dataset Selection**

Like Gleason (2017), as well as others within qualitative research traditions, I approached dataset selection as the first analysis of the dataset because it required extensive investigation of relevant documents, which inevitably resulted in refined selection criteria, development of preliminary codes, and noticing of patterns, irregularities, and themes. Following the policy source identification procedure described by Gleason (2017), who also utilized the WPR Approach, my data selection procedure “[began] somewhat wide, and then increasingly narrow[ed] with each step, much like an

inverted pyramid” (p. 93). After consultation with the Records Custodian at the New Jersey Department of Education, who provided guidance as to the various New Jersey state institutions that held relevant documents related to teacher education licensure, I selected initial data sources. This “wide” approach led to the inclusion of all public documents related to teacher education accessible on the New Jersey Department of Education website and those available via the New Jersey Open Public Records Act (OPRA) from the New Jersey Department of Education, the Governor’s Office, and the New Jersey Division of Talent and Performance.

These requests produced a large, but diffuse possible data pool of teacher education-based documents (totalling several thousand pages of text). Since licenses are one of the “objects” that help to create and define “teachers,” as well as focus the work of teacher education, selecting only documents pertaining to teacher licensure further narrowed the data pool. This smaller pool of documents was then further reduced by setting aside documents tangentially related to licensure or general program requirements but lacking specific applicability *only* to teacher licensure, such as the granting of degrees, which often accompanies licensure, but which does not pertain only to licensure because it also constructs the object “degree.”

To further narrow the data pool, I considered the relationship between teacher education programs and the various documents relating to the relatively recent update of the New Jersey Administrative Code Title 6A:9 (henceforth referred to as NJAC 6A:9 unless the context requires additional detail), which outlines state requirements for the granting of teaching certificates, as well as the expectations to which teacher education

programs are held by the state. NJAC 6A:9 was most recently updated in November 2015 to reflect proposals including those made in June 2014 by the state department of education that require all candidates (preservice teachers) graduating after September 1, 2017 to pass a “Commissioner-approved performance-based assessment of teaching” in order to become licensed (New Jersey Department of Education, 2015, n.p.). This represents a shift in the role of the state in the assessment of preservice teachers seeking licenses, and the relationship between the state and teacher education programs recommending candidates for licensure. Although this appears to be a subtle shift, it is one that is intricately tied to the governmentality of teacher education. Since this policy amendment essentially bypasses teacher education as the knowledgeable authority or expert on teaching, teacher education, and assessment that makes recommendations to the state, the state deprofessionalized teacher education by granting the power to make decisions about the acceptable measures, actions, and approval criteria for teacher quality and teacher education programs unto itself.

Given the significance of these actions, I limited the timeframe of my data to include documents related to NJAC 6A:9A released between June 2014, when the state proposed changes to NJAC 6A:9A, and November 2015, when the state formally adopted those updates. Between those dates, the commissioner shifted in two important ways. First, the commissioner transitioned from overseeing and approving programs that decide how to assess and recommend candidates for licensure, to being legally granted the authority to approve (or disapprove) the acceptability of assessment measures themselves; second, the commissioner was no longer held to the previously required

responsibility that required them to act on suggestions made by teaching and teacher education professionals when making decisions about program approval.

When examining all of the data received from my widest-cast net of documents related to the updates and changes to NJAC 6A:9 between the focal dates of June 2014 and November 2015, one set of policy-shaping documents was released by the state: “Enhancing preparation & certification to increase novice teacher effectiveness,” a PowerPoint presentation that provides the NJ Board of Education’s rationale for proposed changes NJAC 6A:9, 9A, 9B, and 9C (which I will refer to as the NJDOE’s “Teacher preparation vision” presentation, a term used by the NJDOE (2015, p. 6), and “Item C” a document containing the original policy text of NJAC 6A:9, as well as the proposed changes to the same legislation. The State of New Jersey Department of Education issued documents on June 3, 2015, and November 4, 2015 respectively. Additionally, supplementary documents have been considered and included to provide context or additional support to subsequent claims, however the bulk of the analysis attends to discursive constructions within those focal documents.

Given the policy focus of the WPR methodology, my concentration on teacher education and teacher development, and the current revisions to teacher licensure law in New Jersey, state policy documents related to teacher licensure served as rich sources of information in which to analyse problematizations, objectifications, and subjectifications, and the governmentalities they construct. In many states, including New Jersey, student teacher performance assessment represents one of the final hurdles before a student is able to obtain licensure to teach. Consequently, various state policies that focus on

regulating and imposing particular student teacher performance assessments represent one of the last times that a state has the ability to control/create the subject “pre-service teacher,” because that subject will soon transition to “certified teacher,” an entirely different subject that exists in different spaces, is controlled by other structures, and understood to be a separate entity. Furthermore, by selecting assessments or teacher education program approval criteria that create the subject “pre-service teacher” in a particular way, the state gains the ability to hold teacher education responsible for preparing student teachers toward that normalized subject, which provides the state with an additional “objective” lever to influence teacher education without the need for additional input from experts, findings from research, or evidence beyond the performance assessment itself.

### **The WPR Approach**

A critique is not a matter of saying that things are not right as they are. It is a matter of pointing out on what kinds of assumptions, what kinds of familiar, unchallenged, unconsidered modes of thought, the practices that we accept rest... Criticism is a matter of flushing out that thought and trying to change it: to show that things are not as self-evident as one believed, to see that what is accepted as self-evident will no longer be accepted as such. *Practising criticism is a matter of making facile gestures difficult.* (Foucault, 1988, pp. 154-155, emphasis added)

According to Bacchi (2009), one way that poststructural analysis can be used to explore policy is through the seven steps of the WPR Approach. In service to my research questions, my study began with Bacchi and Goodwin’s (2016) “what’s the

problem represented to be” (WPR) methodology as “a means to engage in theorizing [about politics as strategic relations and practices]. The WPR Approach is intended to assist in the analytic task of making politics visible” (Bacchi & Goodwin, 2016, p. 13) by approaching policy with scepticism “toward the full range of things commonly associated with policy: policy itself, the knowledges that support policy and policy proposals, as well as the conventional forms of policy analysis” (p. 3). Building on Bacchi (2009, 2012), Bacchi and Goodwin (2016, p. 20) propose the following seven-step approach to questioning policy that “works backwards’ from policy proposals to *examine* the ‘unexamined ways of thinking’ on which they rely, to put into question their underlying premises” (p. 16, emphasis in original). The steps are as follows:

Question 1: What’s the problem (e.g., of “gender inequality”, “drug use/abuse”, “economic development”, “global warming”, “childhood obesity”, “irregular migration”, etc.) represented to be in a specific policy or policies?

Question 2: What deep-seated presuppositions or assumptions underlie this representation of the “problem” (problem representation)?

Question 3: How has this representation of the “problem” come about?

Question 4: What is left unproblematic in this problem representation? Where are the silences? Can the “problem” be conceptualized differently?

Question 5: What effects (discursive, subjectification, lived) are produced by this representation of the “problem”?

Question 6: How and where has this representation of the “problem” been produced, disseminated and defended? How has it been and/or how can it be disrupted and replaced?

Step 7: Apply this list of questions to your own problem representations.

For Bacchi (2009), the first step in the analytic process is asking “what is the problem represented to be in a specific policy or policies?” (p. 12). This is accomplished by examining the proposed solutions to the problem, suggesting that the proposed remediations to a given problem provide insight into how the problem is represented. The idea of problem representation differs from other forms of policy analysis, many of which implicitly accept the “reality” of the problems they seek to address. In contrast, drawing directly from poststructural ontology, the WPR Approach suggests that problems are made (up) through their representation, and do not exist until represented to exist in a policy or policies (See also the section on “policy problems and representations”).

The second question that must be asked in the WPR Approach is “What deep-seated presuppositions or assumptions underlie this representation of the ‘problem’ (problem representation)?” The point of this line of questioning is to unpack the deep-seated assumptions that inherently undergird problem representations and are presented in proposed solutions by comparing the way that the proposed solutions inform the problem. Additionally, these questions try to question how objects and subjects are positioned in ways that result in the creation of seemingly rational narratives of justification for the control of individuals. Those questions make space for the third question of the WPR Approach, “How has this representation of the ‘problem’ come



about?” In contrast to interpretive approaches, which might attempt to allocate blame or identify motive behind a given problem representation, the post-humanist, poststructural focus of the WPR instead posits which factors (such as particular objects, subjects, or histories) were necessary for the problematization to be represented as logical. Following those questions, the WPR Approach then asks, “What is left unproblematic in this problem representation? Where are the silences? Can the ‘problem’ be conceptualized differently?” Together, those questions comprise the fourth set of questions asked in the WPR Approach, which are intended to highlight some of the gaps in the problematizing, drawing attention to space for alternative conceptualizations and problem representations.

Following those four questioning steps, which primarily focus on the problematization, the WPR process then turns to the fifth and sixth set of questions, which begin to unpack what those problem representations do and how they are reproduced in the world. The fifth question is “What effects (discursive, subjectification, lived) are produced by this representation of the ‘problem’?” and it is followed by the sixth set of questions: “How and where has this representation of the ‘problem’ been produced, disseminated and defended? How has it been and/or how can it be disrupted and replaced?” These questions are not necessarily intended to interpret or explain what the policy is doing, but to recognize and highlight ways that the policy has been taken up, and to draw attention to the notion that those enactments are not inevitable.

Unlike many forms of analysis, the WPR Approach then turns its analytic lens upon itself in order to question the assumptions, problematizations, and ‘answers’ proposed by the researcher as they attempted to answer the first six questions. This

happens in the seventh and final step of the WPR Approach, in which the researcher “Applies the list of questions to [his/her/their] own problem representations.” This step is crucial to the non-interpretivist and anti-rationalist stance of the WPR Approach, because it does not presume to provide definitive answers, which would be antithetical to the poststructuralist foundations of the method. While this process is a recursive one that could repeat indefinitely, it is performed in part for the benefit of both the researcher and audience, as a reminder that the previous answers are to be questioned and approached as non-rational.

Given that the purpose of the WPR Approach is to highlight the *lack* of unifying, rational, or integral problematization, to presume that the answers provided by the WPR Approach were in any way *conclusive* would be to completely misunderstand the purpose of the method. Unlike other approaches, this self-questioning step moves far beyond the purpose of credibility building or rationalization to remove/alleviate doubt in the reader, instead it is intended to be a deconstruction of credibility and rationality as monolithic constructions, showing that all constructions, even those made by the researcher, are not to be considered “real,” “unproblematic,” “rational,” or “complete.” Again, in stark contrast to other methods, the purpose of this method is not to build credibility for the research, but to call into question the unexamined and uncontested credibility of problem representations in policy statements and to critique the very idea that credibility and rationality are reasonable ways to approach policy proposals or analysis. Rather, the WPR Approach attempts to see all proposals and subsequent analyses as part of the

construction of the problem, and therefore as inherently political and party to the subjectification and subjugation that result from problematization.

### **Enacting a Poststructuralist Approach**

In many ways, this study mirrors aspects of both the content focus and style of document-based critical analysis in Clayton's (2017) work, "Raising the stakes: Objectifying teaching in the edTPA and Danielson rubrics." In that piece, which was included in an edited volume examining teacher performance assessments and their relationship to accountability reforms, Clayton closely analysed performance assessment rubrics in order to understand how teaching was objectified. Despite not expressing or perhaps even intending to adopt aspects that might be in line with poststructural conventions, her method did include elements that would resonate with a poststructural approach.

The following discussion is in no way intended to be a critique of Clayton's (2017) work; rather it is intended to illustrate ways in which the boundaries between poststructuralist and interpretivist analyses are not as rigid as I have previously described. I drew these artificially exaggerated distinctions between enactments of poststructuralist and interpretivist policy critique for the purpose of fostering a developing understanding of the differences between those two stances, not because they exist as "pure" and dichotomous entities (a notion that contradicts poststructuralist assumptions). Furthermore, this served as a precaution for myself and my own analysis, prompting me to recursively check that I remained close to a poststructuralist critique focused on raising

awareness of governmentality, not on providing solutions, interpretations, or rationalizations of or against teacher education professionalism.

Clayton began by examining assessment measures that claimed to be “characterizing the breadth and depth of quality teaching” (2017, p. 88) and how that characterization, in turn, influenced policy. She did this by completing an internal analysis of the selected rubrics to understand how the documents conveyed “what is valued in planning, instruction, and assessment for pre-service candidates” (p. 89). This aligns with post-humanist aspects of poststructural methodologies more so than many interpretive ones because it attempts to notice the way in which the document is representing itself and its contents (i.e., with considerably reduced attention to how or why the document was constructed, is used, or may be interpreted). Moreover, her analysis seemed consistent with poststructuralist approaches because of the way in which it attended to and noted “areas of dissonance” (p. 93) and “curious silences” (p. 94) in how teaching was objectified by the rubrics.

In addition to a somewhat loose alignment with poststructural assumptions, Clayton’s (2017) work included elements that resonate with my poststructuralist approach. This similarity exists in spite of her enacting aspects of interpretivist critique (e.g., interpreting the reason why teaching was objectified, debating whether the measures were the best measures to capture teacher quality) and not having claimed or necessarily intended to enact a method somewhat consistent with poststructuralist approaches. This consistency was apparent when Clayton questioned how “[b]y their very construction, these instruments narrow our conceptions of teaching and learning”

(2017, p. 97), which aligns with the way in which documents are seen to shape and constrain realities. Likewise, in the WPR Approach, there is a strong emphasis that “official” documents construct reality in a way that can limit the possible realities people believe can be enacted (i.e., documents shape individuals’ governmentalities in ways that let them see some actions as reasonable, inevitable, or possible, while excluding others). From my perspective, this particular statement was consistent with poststructural methodologies that focus on the creative nature of power, emphasizing how the creation of particular (in this case, narrow) conceptions of teaching and learning concurrently create correspondingly narrow realities of what teaching is and can be.

That having been said, Clayton’s (2017) analysis departed from its alignment with my approach when she went on to problematize and interpret causes in ways that created rationalities about that narrow construction of teaching. For example, she comments that:

In the frenzy to align, calibrate, and validate the practical tools to implement new mandates and be relevant to the profession, this kind of analysis unearths missing aspects that those charged with evaluating teacher candidates and practicing teachers want to be aware of and continue to address in programs and professional development in spite of what is mandated. (Clayton, 2017, p. 97)

Moreover, she notes that her analysis, in the main, is “meant to call our attention to these items in our work at the local level so that we responsibly attend to these measures while not surrendering our capacity to articulate a broader and more inclusive vision of quality for the profession” (Clayton, 2017, p. 97).

While some (e.g., Bloomfield, 2009; Lather, 1991) might describe this as a call to work “within and against” the inherent acquiescence to the control of the State within such statements subtly settles for policy enactment and a reduced vision of professionalism. Clayton (2017) continues, cautioning “educators to remain conscious of what we value even as our instruments narrow what is measured so that we work to broaden the conversation on quality teaching wherever possible” (p. 97). These indirect or unmarked concessions reinforce governmentalities that tend to drive educators and policy analysts to negotiate with or take up the problematizations within the instruments themselves by, for example, offering alternative positions on how teaching should be conceptualized within the assessment (as Clayton [2017] herself does).

The example from Clayton’s (2017) study illustrates the ease and inadvertency with which one can move from a relatively poststructuralist critique to an interpretive one. Existing governmentalities that confine us to the belief and feeling that one must be able to offer a better solution in order to speak against a problem can make this type of analysis and critique particularly difficult to accomplish or to convey to others. This makes it relatively easy and tempting to move from approaches that call into question objectifications and governance toward interpretivist and rationalizing practices of providing alternative or “better” problematizations, which end up constructing or reinforcing the governmentalities and governance they intend to oppose. It is my hope that adhering closely to the underlying poststructuralist conventions infused into the WPR Approach helped me to avoid such pitfalls. As a guide, I recursively checked to ensure that my analysis and critique remained, to the extent possible, focused on the level

of governance and the erosion of professionalism in teacher education, as well as on the mindsets and governmentalities that shape what we see as reasonable, rational, and normal.

### **Data Analysis and Presentation**

To help safeguard my analysis from the concerns that I previously highlighted by contrasting my analysis with that of Clayton (2017), I examined the New Jersey policy proposal identified by the dataset selection procedure described earlier in this chapter using Bacchi and Goodwin's (2016) WPR Approach. As a way to bound this analysis, I first completed an initial reading of the aforementioned documents surrounding the changes to NJAC 6A:9A, with an eye toward identifying sections in which policy proposals, problems, and problematizations are explicitly offered. Next, I attempted to identify areas where problematizations exist, as identifiable by noticing where the document creates and uses subjects, objects, and rationalities, but which have not explicitly been labeled as problems. I then applied the WPR Approach's six questioning steps to the identified areas, so that I could begin to notice problem representations within the document, unpack what those representations require, and trace what those representations create in the world. Within these questioning steps, I paid particular attention to the ways in which aspects of teacher education, as objects, and teacher educators as subjects, were created, characterized, and described.

Throughout this process I documented my analyses in a research journal, where I captured my questioning of the problems presented within the policy documents, as well as with hard copy notations on a copy of the focal texts themselves. As noted by Gleason

(2017) “education researchers operate in an era in which problem-solving is a hegemonic motif; therefore, the WPR method of problem-questioning is a valuable critical practice” (p. 90), and my research journal documented my process of unpacking and questioning of the focal policy’s problematizations.

I then brought together these questionings, searching for what appeared to be patterns or similarities within the policy’s problematizations and problem representations. This approach paralleled the work of Lawless, Coveney, and MacDougall (2014), who, in their attempt to describe a WPR Approach to coding, cite Maxwell (1996), who said “the task [is] not to categorise but to contextualise the data by seeking relationships between the data that act to form a coherent whole” (p. 420). The purpose of this was not to come to or to construct and represent something as “coherent” or “whole.” Instead, my goal was to call attention to the ways that problematizations and problem representations, objects, subjects, and rationalities within the policy interacted with one another, and to gather up enough shards and traces so that their representation in my findings could convey some sense of my thinking to the reader.

In addition to this, I attempted to identify “clear” examples of problematization or problem representation to serve as exemplars in my findings, rather than attempting to analyze or categorize every instance of problematization. Through these two forms of noticing, one more thematic and the other more emblematic, I documented my articulation of the WPR Approach in a way that highlighted problem representations in teacher education, noticed and questioned problematizations within the focal policy discourse, and signposted my actions to make clear to others one way to approach this



type of critical poststructural policy work, including unexpected concerns that may arise when doing so.

Additionally, I completed an intensive series of semi-weekly peer-checks, in which I discussed my burgeoning answers to the questioning steps and my own representation of findings with two colleagues, who have at least a greater-than-surface level familiarity with my work, poststructuralism, and with the WPR Approach itself. The purpose of these checks was not to work toward interrater reliability, as it might be for other forms of qualitative or quantitative research, but rather to ensure that I had intentional opportunities to ensure that my analysis of problem representations reinforced my critique at the level of governance and did not stray into a critique of the policy objects, subjects, and rationalities themselves.

Following that process, I strove to enact the WPR Approach's seventh step, which turns the poststructural analytic lens from a focus on the policy documents onto the policy analysis generated by the six previous questioning steps. To accomplish this, I interrogated and pushed back against the assumptions and rationalizations generated by and through my attempts to "answer" to the first six questions, regardless of the ways in which prompted me to push back on the conventional approaches to and structures that support policy analysis, teacher education research, and dissertation writing. During this process, I hoped to not only apply the analytic lens of the WPR to my analysis in order to capture the questioning of my own assumptions, but also to reinforce the created and dynamic nature of knowledge as viewed from a poststructural perspective. This required multiple, close re-readings, as well as an archaeological exploration of the assumptions

and knowledge constructions that I made in my attempts to complete the six questioning steps, the ways I approached writing up and representing my findings, and the various governmentalities of teacher education that make traditional methods appealing.

In doing so, I hoped to present the results of this analysis in ways that highlighted for the reader various instances of problem representation, posited and contested the inevitability of these representations. I also attempted to do this work in ways that simultaneously raised critical attention to the ways in which these problem representations problematized teacher education and teacher educators in ways that seemingly justified external State governance and deprofessionalizations of education.

In addition to the fulfilment of the study aims listed above, I felt that it was important to represent what I learned from the WPR Approach's step seven in a way that reflected and recognized the complexity of deconstructing one's own understandings above and beyond the ways described by Bacchi and Goodwin (2016). Consequently, it is my hope that I was able to render this process into text in a way that made that complexity apparent to anyone who may encounter the resulting document in the future.

### **Poststructural Study Trustworthiness Considerations**

Trustworthiness in research, in a poststructural sense, does not necessarily require or seek to work toward a sense of universal, objective, and empirical truth *in doing* the work (validity), or be found *through doing* the work (veracity). Instead, a transient, contingent, and dynamic credibility is constantly negotiated and renegotiated between the researcher, research, and reader. In contrast to methods that draw on positivist assumptions, such as data triangulation, researcher objectivity and non-interference, and

replicability (cf. Lincoln & Guba, 1985), “[p]oststructuralist thought denies the idea that there is a fixed or objective ‘truth’ waiting to be discovered, so this complicates the matter of validity [in research]” (Gleason, 2017, p. 100). As a result, cultivating some form of trustworthiness in poststructuralist work takes on a very different guise from that donned by other forms of research more closely connected to positivist traditions.

From this perspective, the very notions that are typically considered to build study trustworthiness (validity, generalizability, etc.) can be considered “folk notions” that represent vestigial “ideas about how scientific work should be done” in order to build and convey illusions and impressions of trustworthiness (Kleinman, Copp, & Henderson, 1997, p. 469). I agree with Kleinman, Copp, and Henderson, who maintain that these holdovers from more positivistic traditions make it difficult to take an open approach to the use of emotions in analyses, key social studies research tasks, and to the conducting and viewing of all forms of research, both inside and outside of the social sciences. Similarly, Van Bouwel (2004) posits that these “structuralist notions” require a rethinking and reconceptualization for applicability and efficacy within the social sciences. As such, I did not pretend to wrap my study in the façades of trustworthiness valued by empiricism, but instead, the following section describes how I was considering these notions through the lenses of poststructuralism and, more broadly, the traditions of qualitative research.

### **Validity**

Poststructural validity, in stark contrast to many other forms of validity, does not necessarily require adherence to or reflection of content or context, instead it “produces

its own validity by being iterable,” which is to say, “it is a valid example of itself” (Szafraniec, 2007). This concept makes notions of validity, even within poststructuralist traditions, varied and dynamic, although they all in some way deal with the acceptance or rejection of various understandings of truth.

While Foucault does not wholly reject notions of truth or objectivity, he does note that truth is conditional and authorizes only one subject, with intersubjective truth being a reflection of shared positionality, not a reflection of validity (Winter, 2000). This contingency of truth means that poststructuralist research endeavors can only be understood as valid “relative to the stage of the research process” (Seals, 1998, p. 68) and reflects only “the correlation of the research methods and the purpose of the research,” which comprise the “truth that is available to us” (Winter, 2000, p. 13). In essence, this view suggests that validity is a construction and exemplification of an on-going conversation of “the rhetorics of the future” (Tomlinson, 1989, p. 44) expressed through “endless stories, like this one” (p. 57).

This approach also intertwines to an extent with Dadds’s (2008) notion of “empathetic validity,” which was developed within the context of practitioner research. Dadds describes empathetic validity, in part, as a study’s ability to contribute to “positive human relationships” “in an age of increasing violence as well as stress and tension in the workplace” (2008, p. 279). Given the nature of my study and its focus on deprofessionalization, this form of validity seemed salient despite its historical roots drawing from traditions that differ from poststructuralism. Empathetic validity requires that the research change the researcher and the research beneficiaries as well as

intentionally work toward influencing the audience of the research. Moreover, this type of work strives toward creating empathetic validity by cultivating a community of “connected knowers” who are encouraged to “learn to get out from behind their own eyes and use a different lens” (Belenky, Clinchy, Goldberger, & Tarule, 1997, p. 115), which relates well to the work of educational researchers, teachers, and teacher educators in an era where they are increasingly positioned as non-knowers and required to use mandated and narrow lenses.

Given these diverse understandings, I approached validity in this study from a perspective reminiscent of that espoused by Lather (1993), who suggested that these foundational assumptions prompt us to seek to recursively construct and deconstruct discourse as a way of understanding validity in ways that undermine traditional conceptions of universal and grand truths. In other words, Lather’s notion characterizes the measure by which I personally assessed the validity of this work—did this study participate in opening up for questioning that which is presented and understood as true? Consequently, this study sought to build from Lather’s notion, understanding and enacting validity as a real, but transient sense of logic (or non-logic) that is not *after* (as in seeking) Truth, but *after* (as in post) truth.

### **Ethics**

As a mentor text for poststructuralist ways of understanding and enacting ethics, I turned to Bacchi (2007), whose understandings were incorporated into the later work of the WPR Approach (Bacchi & Goodwin, 2016) that I built upon in this study. Bacchi (2007) explored the issue of ethics of problem representations and in policy research and

analysis, focusing on the need to work toward broadening of the implications of ethics that result from particular problem representations. In that work, she noted that there is often a distinction drawn between the ethical and the ordinary, and concluded that her goal was to breach that boundary in order to encourage reflection on ethics in broader ways. She suggested that there is value in moving away from an idea of ethics as a binary conception of things that are enacted or not and toward a privileging of ethical reflection as something that asks each individual to question what they believe, the influence those beliefs have on the world, and the neutrality or normality of their perspective. Bacchi (2007) cited Churchill's (2002) description of ethical reflection as "a particular kind of thinking" (p. 62) that "involves exploration and openness to differences undertaken in the spirit of moral agnosticism—the assumption that I do not possess the final truth in most issues" (p. 55, as cited in Bacchi, 2007, p. 6).

In the spirit of this positioning of ethics, ethics as a singular or understood thing to be enacted and strived for in research falls away, while an openness to and intentionality toward questioning things that appear true and seeking truth in things that feel strange comes into focus. In a sense, ethics then becomes an individual expectation of reflection that has implications both for me as a researcher and author in this work, and for readers as well.

In essence, both parties (myself as researcher/writer, and others as the reader) are asked to participate in a cycle of ethical reflection throughout the processes of constructing, representing (writing), and (re)reading this document. During each phase, considerations must be taken about how that work is done, what implications that may

have in the world, and what other constructions are made along the way. Moreover, this reflective stance also asks that presumptions, pre-existing understandings, and prejudices be set aside (to the extent possible), so that we each approach this process with an eye toward changing, questioning, and renewing our understandings. In a sense, we are asked, as noted by Churchill (2002), to approach this work agnostically—holding nothing as sacred—toward our current and comfortable understandings of how things are, should be, or could be.

### **Generalizability**

The goal of this work was not to seek or work toward revealing a generalizable or replicable truth, but rather to participate in explication of one facet of a multifaceted understanding of truth (cf. Frost & Elichaooff, 2014) to make space for the possibility of difference and change. Furthermore, like other forms of qualitative research, this study sought to achieve resonance (Tracy, 2010), rather than generalizability. According to Tracy (2010), resonance is achieved if the study “influences, affects, or moves particular readers or a variety of audiences through” either “[a]esthetic, evocative representation,” “[n]aturalistic generalizations” or “[t]ransferable findings” (p. 840). I share in Tracy’s position, believing resonance to be a valuable form of generalizability for qualitative, social science research.

Key to achieving this form of resonance is that the work must have a) aesthetic merit and b) transferability (Tracy, 2010). To have aesthetic merit, not only must a text be presented in a “beautiful, evocative, and artistic way,” but also the researcher must “take seriously the importance of skills emanating from literature, creative arts,

introspection, and memory work” (Tracy, 2010, p. 845). At the same time, the aesthetics must demonstrate “the way the text is written or presented is significantly intertwined with its content” (Tracy, 2010, p. 845). I also used Tracy’s standard to assess the extent to which my work was transferable, which she says is “achieved when readers feel as though the story of the research overlaps with their own situation and they intuitively transfer the research to their own action” (p. 845). Through both attempts to craft an aesthetically evocative and transferable text, I hoped to develop resonance with the reader, as well as cultivate the broader “empathetic resonance” (Sardello, 2008), which is “the resonance of the individual soul coming into resonance with the Soul of the World” (p. 13).

Although it was not my goal, this approach to understanding generalizability also mirrors aspects of Prus’s (1994) concept of “generic social processes.” This notion is used to reconsider generalizability in qualitative research, and has been taken up by some (e.g., Walby, 2012) as a way to examine Foucauldian studies. Through this notion, Prus (1994) examines society at the level of “abstracted formulations of social behaviour” (p. 395), in which he posits that individual social practices are analogous because of the similarity of their underlying problematizations, which exist in multiple, distinct but related, formats and contexts across society. In this approach, this form of “generalizability” stood in place of any more traditional expectation of study applicability beyond the studied group and context. Like Prus, I believe it is important to attend to the ways in which individuals are categorized and agree that research should be less concerned with the ways in which all members of a socially-constructed category are



similar, instead focusing on documenting the generic processes by which society is organized. While I believe that this aligned with my focus on policy and its connection to governance, I have not specifically attempted to connect to other, similar social processes, which would be necessary for a Prussian analysis.

### **Reliability and Limitations**

In keeping with the poststructural perspectives of this work and my own personal adherence to deconstructivist principles on truth and representation, I do not claim to be, nor do I claim that the work produced seeks to be reliable in the traditional sense. The greatest limitation of this study would be to presume that I or the findings produced strove to be reliable in that way. In fact, I would prefer it if this work be approached with the understanding that I was explicitly not to be relied upon and that the processes by which we typically build trust and reliance may not be as solid and reasonable as they appear or are taken to be. In the end, this stance leaves us, me as the researcher in this study, teacher education as a profession, and you as a reader with one critical directive, which itself rests at the center of all poststructural analyses: Question everything.

## **CHAPTER FOR FINDINGS AND DISCURSION**

In order to begin to unpack the ways in which notions of professionalism were constructed and positioned within the discourse of updates to NJAC 6A:9, I began by identifying one focal document within the collection of documents collectively distributed by the NJDOE as “Item C” (NJDOE, 2015 [*ap.* 15 H.L.]). Item C comprises several documents, each produced by the state and simultaneously made available to the public as a collection of documents related to “Item C” of the NJDOE board meeting held on November 4, 2015 [*ap.* 15 H.L.]. Within the collection of documents distributed as Item C, I focused on one particular document (“Document 4,” provided in the Appendix [p. 221]), which was not given a distinct title by the state, and which simultaneously provides the “previous” text of NJAC 6A:9, as well as the proposed additions/deletions/amendments to that policy.

For the sake of clarity, I will refer to this document as “NJAC 6A:9 Proposed Amendments” (Item C document 4, 2015 [*ap.* 15 H.L.]), phrasing used to describe those documents elsewhere in Item C, or as the “focal document” or “document four.” Moreover, given that multiple documents comprise Item C, each with its own

pagination, citations referring to text in these documents will use the following scheme: “Item C document #, document nominal page #.” Unless otherwise specified, the author of all documents in Item C is the NJDOE and the publication year is 2015 [*ap.* 15 H.L.]. Since each document within Item C provides a page number, but those page numbers are not unique (i.e., there are four instances in which a page is listed as page “1”), each time the page numbering changes it is considering a new document (i.e., documents 1-4), and will then be cited using the nominal pagination that appears at the bottom of that document. Therefore, the fourth instance of a page labeled as page 1 would be cited as “Item C document 4, p. 1.”

The structure of the focal document utilizes a system of multiple simultaneous representations, in which both the “previous,” “deleted” text of NJAC 6A:9A is included within brackets [thus], and the proposed additions to the text of NJAC 6A:9A are indicated in boldface **thus** (Item C document 2, p. 23). As an example, in the following selection, the phrases “Requirements and standards for the approval of professional education” and “preparing educational personnel” existed in the previous version of NJAC 6A:9A, but have been removed from the updated version of the text:

6A:9A-3.1 [Requirements and standards for the approval of professional education] **Approval criteria of educator preparation** programs [preparing educational personnel]. (Item C document 4, p. 1)

Also within this example, the phrase “Approval criteria of educator preparation,” which appears in boldface, has been added to proposed policy text and therefore did not appear in the previous iterations of the statute. Moreover, the single word “programs,” which

appears in neither brackets nor boldface, represents the sole instance of an unchanged word or phrase that appears in both the earlier policy text and remains in the proposed text within this excerpt.

Given these structures, which attempt to simultaneously represent that which has been added and that which has been removed, the focal documents in Item C can be considered and analysed as a text *sous rature* (Atkinson, 2001 [*ap.* 1 H.L.]; Derrida, 1974 [*av.* 26 H.L.], St. Pierre, 1997 [*av.* 3 H.L.]). From this perspective, both the bracketed, “deleted” text of the earlier document as well as the boldfaced text that is proposed to be included can be considered simultaneously as comprising the text of Item C document four, despite the condition of the bracketed text being “under erasure” by virtue of the provided semiotic structural scheme (however, it is of note that this bracketed text is not under the condition of “bracketing,” which, as in this example, is often considered to be an aside denoted parenthetically. For more on this topic, see Husserl’s [2002; *ap.* 2 H.L.] descriptions of bracketing in service to *Zu den Sachen selbst*).

When describing analysis of texts *sous rature*, Derrida (1974 [*av.* 26 H.L.]) extended the considerations offered by Heidegger (1956 [*av.* 44 H.L.], as cited in Spivak, 1997 [*av.* 3 H.L.], as cited in Derrida, 1997 [*av.* 3 H.L.]), moving beyond Heidegger’s considerations of erased text as one of textual “being” (Spivak, 1997 [*av.* 3 H.L.], p. xiv), to one that

supports and raises questions of (inter-, intra-, and extra-) textual topology in alignment with Derrida's supposition that "*il n'y a pas de hors-texte*" (1976 [av. 24 H.L.], p. 158).

The "erasures" and "additions" in Item C document four make plain the complex conditions under which Derridean analyses trouble the notions of what is or is not a part of a given text. As Spivak (1976 [av. 24 H.L.]) notes, the importance of these remnants suggest that such writing denotes the tension between being inaccurate (and thus crossed out), yet necessary (and thus remaining legible). Such tensions remain and can be seen through the lens of the Derridean notion of trace (1976 [av. 24 H.L.]), which when translated from the slightly more complex notion in the French (cf. Spivak, 1976 [av. 24 H.L.]) allows an unpacking of (con)tensions within a text as considerations of both path, which allows for the tracing of a text, and the leavings of a text, or the traces left behind. This notion intertwines with the poststructuralist considerations of archaeology and genealogy, described by Foucault in *Archaeology of Knowledge* (2012 [ap. 12 H.L.]) and Foucault (2003 [ap. 3 H.L.]) respectively. In other words, such considerations call into question what is or is not able to be a part of a given text (or apart from it), and poses questions about how best to interpret the "nature" of an added deletion or a deleted addition.

### **Without: A Trace of Teacher Education Professional(ism/ity)**

The following details findings from two sets of comparative analyses of discourse around notions of teaching and teacher education professionalism, the teaching and teacher education professions, and the professionals who enact teaching and teacher education. The multiple extant timeframes conveyed within the *sous rature* text of Item

C document four allow for an analysis of shift in discourse and attribution around notions of professionalism and differential ascriptions of the term “professional” across time and between different types of teacher education programs, yet contained within a single text.

The first portion of this analysis will trace the ways in which discursive constructions of profess\* within the so-called previous, “deleted” text of NJAC 6A:9A in comparison to constructions of profess\* within the proposed, “added” text. Following that, the analysis will shift from one that is examining multiple time in Item C document four (i.e., the “past” policy text and the “future” policy text), to one that examines differences between the ways in which various constructions of profess\* are differentially ascribed to or associated with different types of teacher education programs or entities preparing future teachers (e.g., between CEAS and CE programs or between institutions of higher education and so-called “alternate route” programs).

Such discursive analyses of “profess\*” and the various constructions and attributions of that notion may seem, on the surface, to be too “on the nose” as a way to examine and critique the deprofessionalization of teacher education. On the contrary, unpacking and “unbuilding” the ways in which policy discourses construct professionalism, professionalism, and the teacher education profession help not only to better understand and resist how policies deprofessionalize teacher educators, but also lend insight into ways in which profession(al[ism/ity]) is(/are) used (as object) to construct teacher education professionals (as subjects), which aligns with a Foucauldian analysis of subjectification (Foucault, 1982 [*av.* 18 H.L.]; cf. Bacchi & Goodwin, 2016 [*ap.* 16 H.L.]).

## A Policy Discourse in Changing Times, or Boldfaced Deprofessionalization

The following (re)presents selected instances of profess\* in both the “previous” policy text as well as within the proposed, amended text (Table 1). These instances have been selected because they referred to teacher education, aspects of teacher education programs, or events (such as coursework) that take place during the timespan of a teacher education program. Other instances, such as those primarily referring to teaching, the standards to which teachers are held, or professional accreditation organizations (e.g., CAEP, NCATE), have been excluded from this analysis. This focused selection of exemplars will serve to highlight and contextualize some of the more pertinent and illustrative findings from this portion of the analysis in conjunction with the full instances of Item C, documents 3 and 4 (Table 2), kindly relegated to the Appendix.

Table 1

*Instances of “profess\*” in NJAC 6A:9A between “previous” and “proposed” text*

<u>Term</u>	<u>n</u>	<u>Previous</u>	<u>Proposed</u>	<u>Δ</u>
Profess*	29	[17]	<b>12</b>	-5
pre-professional (instructional hours)	1	[0]	<b>1</b>	1
pre-professional component	3	[0]	<b>3</b>	3
pre-professional experience	2	[0]	<b>2</b>	2
pre-professional preparation	1	[0]	<b>1</b>	1
pre-professional requirements	1	[0]	<b>1</b>	1
professional component	8	[8]	<b>0</b>	-8
professional (courses)	1	[1]	<b>0</b>	-1
professional education and development	2	[1]	<b>1</b>	0
professional education programs	2	[2]	<b>0</b>	-2
professional educator preparation	1	[0]	<b>1</b>	1
professional educator preparation programs	2	[2]	<b>0</b>	-2
professional preparation	3	[3]	<b>0</b>	-3
professional teaching experience	2	[0]	<b>2</b>	2

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Note: As in the text of Item C documents 3 and 4, the table above represents “previous” text (proposed deletions) in brackets [thus] and amended text (proposed additions) in boldface **thus**.

As seen in Table 1, overall instances of profess\* decreased from 17 to 12, a nearly 30% decrease in raw count. However, perhaps more importantly and not well captured by the table, it is not only the overall decrease in instances of the terms profess\* that is cause for note, but rather the substantive differences between the ways in which those terms are used that effectively deprofessionalize teacher education through mechanics, such as differences in semantics (e.g., collocation, adjacency, differential reference or signification [e.g., changes in anaphoric and cataphoric attribution; theme/rheme]).

Importantly, these linguistic changes were, according to the NJDOE, classified as either *organizational* (in which terms “[move] to a different section or [combine] rules”) or *stylistic/grammatical* (in which “changing term or making small language shift [example: “superintendent” to “chief school administrator”]”; NJDOE, n.d., p. 2 [matrix FD]) in purpose. This contrasts with the other types of changes outlined by the NJDOE, which were *clarification* (“adding, amending, or deleting language to clarify original intent”) and *substantive* (“adding, amending, or deleting requirement;” NJDOE, n.d., p. 2 [matrix FD]). Understanding the categorization of these changes reveals that the goal was for the language changes to reflect changes to sections, that rules had been combined, or stylistic or grammatical updates.

The amendments to the policy document, however, not only reflect an overall reduction in instances of profess\*, they also serve to redefine the extent to which professional(ism/ity) is attributed to and associated with teacher education programs and



the components or experiences of those programs. For example, there are multiple ( $n=7$ ) instances of “professional education programs,” “professional educator preparation programs,” and “professional preparation” in the previous policy text. In each of these seven examples, teacher education itself is marked as professional or as a factor in producing professionals.<sup>1</sup> Regardless, in either interpretation the work or products of teacher education are marked as professional. In contrast, only one such instance exists within the amended text of the policy (a reduction of >95%).

At the same time, no instances of “pre-professional” exist within the previous policy text, while multiple ( $n=8$ ), varying instances exist within the proposed text. While these seemingly mirror instances of “professional component” ( $n=8$  in the previous text, reduced to  $n=0$  in the amended text), notions that these experiences are “pre-professional” somewhat downgrades their professional(ism/ity) by locating the professional as somehow after or beyond the teacher education program. Moreover, whereas in the previous text “program components” referred to all teacher education programs, within the amended text, the instances of “pre-professional components” refer only to certain teacher education programs (i.e., CE or “alternate route programs; More information about the differences between how professional(ism/ity) was distributed

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<sup>1</sup> Depending on how “professional educator preparation programs” is parsed, for which the text gives no clear delineation, determines whether it refers to the program as professional (i.e., a professional program for the preparation of educators) or to those individuals prepared by a program as professional (i.e., the preparation of professional educators). This vagueness is compounded by instances that seem to suggest that both/either interpretation could be possible. For example, the text “Requirements and standards for the approval of professional education programs preparing education personnel” (Item C document 4, p. 1) seems to support the notion that the preparation itself is professional, while “The department shall approve all professional educator preparation programs leading to State [*sic*] certification” (p. 3) is ambiguous, and “Institutions of higher education preparing professional educators” (p. 6) seems to imply that the educators prepared are professional, but not necessarily the programs themselves.

between types of programs within the proposed text comprises the focus of the next section).

When comparing the previous text to the proposed text, an overall decrease in both count and extent to which teacher education programs and/or their work, are described as professional is apparent. Such differences seem to transcend the bounds of organizational or stylistic/grammatical changes, as posited by the NJDOE. Since these changes seem to meaningfully alter the policy text, they more accurately reflect the so-called “clarification” or “substantive” changes described by the state (NJDOE, n.d., p. 2 [matrix FD]).

Not only do the changes alter the policy document, they alter and constrain the identity/ies made available to teacher education programs and as a result of those descriptions. Similarly, professional(ism/ity) simply appear less frequent in relation to teacher education (from  $n=17$  to  $n=12$ ), and when it does appear it is often confined to notions of “pre-professional,” which despite being located temporally within teacher education, seemingly hint at professionalism of teaching, while limiting association of professional(ism/ity) to teacher education. This is amplified by the aforementioned fact that instances in which teacher education programs are described as professional (e.g., “professional education programs”) drop drastically (from  $n=7$  to  $n=1$ ), regardless of any instances in which aspects, courses, components, or requirements of a teacher education program are described as professional ( $n=9$  in the previous,  $n=2$  in the amended). This decrease in the description of programs as professional was not a coincidental linguistic alteration, but one that was, at least to some extent, an intentional change. Indeed, the

NJDOE notes, “The Department also proposes to delete ‘professional’ before ‘educator preparation programs’ to align with updates to terminology” (Item C document 2, p. 4); however the discursive effect is one of more than terminological shift.

In the Derridean sense, traces of these aporetic tensions exist within the text, both between the notions of past, present, and future existing simultaneously *sous rature*, which in and of themselves challenge traditional notions of textual topography, and between the stated purpose of the policy amendments and their discursive outcomes. Unlike other forms of discourse analysis, deconstructionist approaches are less concerned with attention to the intentionality of text or to the influence of power within text (Chouliaraki, 2008 [*ap.* 8 H.L.]), instead they focus on the web of meanings and significations that comprise the tenuous and contradictory foundations upon which understandings are constructed, including those omitted or deleted from a notion. Consequently, as noted by Sayyed (2015 [*ap.* 15 H.L.]):

No sign is unified because it is not *fully* present. A sign for something must imply that thing’s absence (just as a copy must be different from an original in order to be a copy, or a repetition can never be an exact repetition, otherwise it could be the thing itself). That’s why half of the sign is always ‘not there’ and the other half is always ‘not that.’ (p. 5, emphasis in original)

Within the context of the shifting quantities and qualities of connections between teacher education programs and professionalism, the concurrently notable presence of the absence of professional(ism/ity) and the absence of the presence of professional(ism/ity) makes visible the tension between goals of strengthening teacher education while also

disassociating the programs that prepare future educators from notions of profession(al[ism/ity]). Through the simultaneous addition of removals of professional(ism/ity) and the omission of inclusions of professional(ism/ity), the tracing of this policy suggests deprofessionalizing changes to teacher education between the times indicated by the previous text and the proposed text.

**Programming higher education.** The next section presents findings that suggests that the policy amendments positions college- and university-based teacher education programs farther from notions of professional(ism/ity) than alternative route programs. It does this by demonstrating that the overall changes to discourse around professional(ism/ity), as viewed in the decrease and qualitative changes instances of profess\* over the “time span” represented by Item C, did not equally remove notions of professional(ism/ity) from traditional route and alternative route programs; on the contrary, the data suggest that professional(ism/ity) was almost entirely separated from traditional route programs while alternative route programs retained association with professional(ism/ity).

However, before transitioning to discuss differences between the traces of professional(ism/ity) between programs in the proposed text, it is helpful to look at the way in which references to higher education and the colleges and universities associated with “traditional route” teacher education also change between the “past” text and proposed text. Examining how higher education institutions were removed from policy discourse serves to highlight the decoupling of teacher education from the traditional sites, knowledge bases, and scholar-practitioners that have historically comprised the

teacher education profession. Moreover, as the following section will demonstrate, the discursive deprofessionalization of these programs and individuals is more severe than that experienced by alternative route programs. Like the removal of the word “professional” from association with teacher education, the distancing of teacher education from higher education was also an intended outcome of the amendments to NJAC 6A:9A. As noted by the NJDOE, “The Department proposes throughout the chapter to replace ‘institutions of higher education’ or ‘colleges and universities’ with ‘CEAS educator preparation programs,’ when appropriate, to align with shift in terminology used to differentiate between program types” (Item C document 2, p. 2). This shift, intended to “help maintain stylistic consistency” (Item C document 2, p. 3), resulted in a reduction in the number of instances in which institutions of higher education, colleges, or universities, are connected to teacher education programs.<sup>2</sup>

In the previous policy text, there were multiple instances of references to higher education ( $n=11$ ), as well as colleges ( $n=15$ ) and/or universities ( $n=13$ )<sup>3</sup> as the entities

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<sup>2</sup> For the purposes of this discussion, references to higher education not directly connected to teacher education programs have been excluded. Such instances include examples such as references to the New Jersey Secretary of Higher Education, who is responsible for the approval of out-of-state programs, or references to the Council on Higher Education Accreditation. This is not to discredit the relationship between these instances and teacher education programs or policy discourse, but rather to retain the focus of this chapter and discussion.

<sup>3</sup> Similar to the distinction made for “higher education,” instances in which, for example, colleges are referenced in situations such as, “for the first two years of college” or prerequisite requirements such as expectations that candidates hold a degree from a college or university, have been excluded from this section. Once again, this does not ignore the fact that such comments bind institutions to teacher education while locating teacher education within colleges, but rather as a way of facilitating the navigation of this section for the reader. Likewise, instances of college being used adjectively to describe faculty or to describe out-of-state institutions have been excluded, because such distinctions pull focus from New Jersey and, more importantly, institutional responsibility for teacher education, despite their obvious connection(s).

responsible for enacting teacher education programs or ensuring their quality. In each of these instances, it is the institution of higher education, college, and/or university that is directly positioned as the (en)actor of some aspect of teacher education.<sup>4</sup> Within the policy amendments, these instances have been largely replaced by program-level responsibilities.<sup>5</sup> Moreover, the frequency and function of references to higher education, colleges, and universities starkly differs between the previous and proposed text. As with instances of professional, there is an overall decline in occurrences of higher education, colleges, and universities in the proposed text as compared to the previous.

Applying the inclusionary criteria described previously (see footnote 3), resulted in the following: higher education ( $n=2$ ); college ( $n=0$ ); university ( $n=1$ ). For each of these three instances, the term was paired with an “and/or” programmatic alternative to institutional level responsibility. Even in the section that describes CEAS programs, which by the NJDOE definition are linked with institutions of higher education, both instances of “higher education” were followed by the phrase “and/or their CEAS educator preparation programs” (Item C document 4, pp. 11, 22). The sole included instance of a reference to “university,” which was already on the border of non-inclusion in the sample because its connection to teacher education is a passive rather than an active one, similarly requires that “**A clinical supervisor shall: [...] “Be employed by the program**

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<sup>4</sup> For example, “*Colleges and universities shall recommend for certification to the Department only students who have [...]*” (Item C document 4, p. 7, emphasis added; cf. footnote 3).

<sup>5</sup> For example, “*CEAS educator preparation programs shall recommend to the Department certification only for candidates who have [...]*” (Item C document 4, p. 21, emphasis added; cf. footnotes 3 & 4).

**or university**” (Item C document 4, pp. 19-20). In contrast, the parallel text in the previous iteration of NJAC 6A:9A stated “[Collegiate faculty assigned to supervise students] shall: [...] Be [full-time faculty members or part-time faculty]”<sup>6</sup> (Item C document 4, pp. 19-20), which more clearly specifies the relationship between the university and the individuals who may serve as a supervisor for students within their student teaching/clinical experiences (i.e., they must be full- or part-time collegiate faculty, as compared to one employed by either the teacher education program the university). In sum, the linguistic alterations to the proposed policy text seem to affect not only small terminological updates, but also (re/un)markedly (re/de)construct the identities and enactments of teacher education. In particular, these changes seemingly alter most substantially those programs closely associated with institutions of higher education, colleges, and universities—traditional route teacher education programs.

Coinciding with the overt and intentional effort to remove language related to higher education to accommodate alternative route programs that often lack such affiliations, the policy discourse not only removed linguistic association with higher

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<sup>6</sup> N.B.: In this quote, the bracketed text reproduces the format of the “deleted” policy text as per the NJDOE; however, the bracketed ellipses follow the conventions for omissions within the middle of a quotation as specified by the *Modern Language Association Style Guide* so as to clearly indicate the ellipses were inserted by the quoted quotation’s quoter, rather than by the quoted quotation’s author. This contrasts with the conventions described in the *Publication manual of the American Psychological Association* (6<sup>th</sup> ed.) §6.08, which indicate that ellipses should be used unbracketed. The additional utility and specificity granted by the bracketed ellipses required by the MLA, however, makes such abrogations worthwhile. Given that the bracketed text in this instance conveys brackets used in the quoted document, not text bracketed by the quoter to demonstrate alteration of the text, traditional stylistic conventions for bracketed text do not accurately represent the intended quotation. This therefore complicates the application of such structures, jeopardizing the effectiveness of such conventions to meaningfully elicit appropriate readerly understandings, assumptions, and expectations for/of intended meaning, as opposed to greatly facilitating inaccurate understandings/accurate misunderstanding.

education, but also decoupled expectations for institution-level commitment from the work of teacher education. Moreover, the changes to the language shifted and reduced responsibility for teacher education to the program level, moving institutions of higher education from partners in the enactment of teacher education, to enforcers of accountability ensuring program compliance with State regulation(s).

In support of this claim, colleges and universities are frequently positioned within the previous policy text as the party responsible for confirming that their programs meet approval standards—that only students who demonstrate commitment and capability are admitted to, progress through, and graduate from their teacher education programs, and are thus qualified to be recommended for licensure. For example, in each of the following, higher education, colleges, universities, and/or their faculty are positioned as those held accountable by the policy text:

1. “Higher education institutions that prepare educators shall be required to have programs approved as follows: [...]” (Item C document 4, p. 5);
2. “Formal admission to teacher preparation programs shall be reviewed by colleges and universities [...] and shall be granted only if: [...]” (Item C document 4, p. 6);
3. “The college or university faculty shall evaluate each student at the end of the semester prior to student teaching. The faculty evaluation shall be based on a comprehensive assessment of relevant indicators [...]” (Item C document 4, p. 7).



In contrast, parallel excerpts from the amended text place such responsibilities at the program level (divided between traditional route and alternative route programs), as seen in the examples below:

1. “CEAS [Traditional route] educator preparation programs shall implement the program requirements pursuant to this subchapter” (Item C document 4, p. 11);
2. “A candidate who starts a CEAS [traditional route] educator preparation program [...] shall be admitted only if he or she meets the GPA and basic skills requirement [below]” (Item C document 4, p. 11);
3. “CEAS [traditional route] educator preparation programs shall assign to clinical practice candidates in the preparation program who have completed the following minimum clinical experience requirements: [...]” (Item C document 4, p. 18).

Such expectations falling at the program level are not new to alternative route programs, which are frequently unaffiliated with institutions of higher learning and have often only existed at the program level. For alternative route programs, nothing is overtly gained or lost through the terminological disassociation of colleges and universities from teacher education, but it does seem as though the removal of higher education from teacher education may represent a loss for traditional route programs. However, whether that loss manifests as decreases in shared responsibility for preparing students, institution-level support for and expectations of co-participation in teacher education,

decentering of traditional route programs in favor of privatized or for-profit teacher education, or as other intangibles is not well-captured within the policy text.

**Alternating currents.** The unwritten “gains” and “losses” for programs described in the previous section did not comprise the only substantive changes to the “programmatization” of teacher education, especially for traditional route teacher education. One significant change captured by the shift in policy discourse centers on the procedures for program approval and formulation of two critical bodies, “state program approval councils” (SPACs), and *Program Approval Committees*. Each of these entities, assembled by the NJDOE/state education commissioner, were intended to provide expertise, evidence, and advice about programs and program approval to the NJDOE. Although final approval always rested with the NJDOE, SPACs and Program Approval Committees previously represented a “three-tiered system of program approval” (Item C document 4, p. 2). Within this multi-leveled system, SPACs and Program Approval Committees were responsible for several important functions including, but not limited to:

1. “[recommending] appropriate action regarding the addition of a new or substantially revised certification program”;
2. “[advising] the commissioner on matters pertaining to higher education teacher, administrator, and educational service personnel preparation quality issues”; and
3. “[reviewing] program information for the periodic review of program status” (Item C document 4, pp. 2-3).

Importantly, SPACs were intended to represent “peer review” and expected to “make final recommendations regarding approval of programs to the Department,” and then, “[b]ased on the recommendation of the State [*sic*] Program Approval Council, the Department shall take appropriate action regarding program approval” (Item C document 4, p. 3).

This relates to the programming of teacher education because the policy amendments fundamentally reformulated the ways in which these councils and committees were defined, and what institutions were represented within them and in what proportions. In doing so, the formulations of these groups not only reveal traces of decentralization of higher education and traditional route programs, but also profoundly altered the relationship between higher education, alternative route programs, and teacher education programs.

In service to their role as peer review, Program Approval Committees were described within the previous policy text as being “comprised of three members representing higher education and K-12 school districts who have expertise in the certification program under review” (Item C document 4, p. 2). Similarly, the SPACs were “comprised of 11 members, including six higher education representatives and five P-12 practitioners” (Item C document 4, p. 2). Within these groupings, the presence of representatives from institutions of higher education is manifest, as is a(n) (im)balance of representation between higher education and P-12 practitioners and/or school district representatives.

Attending to this (im)balance is interesting because it serves as a tangible, yet still abstract trace left in the discourse to analyze whose expertise is valued, in what proportions, and for what purposes. Within the prior text, the SPAC, Program Approval Committee, and (New Jersey) Department (of Education), each function as a “tier” in a three-tiered system for program approval. Zooming in, the text makes clear that such representatives do not exist in equal quantity (3 members in a Program Approval Council; 11 members in a SPAC; and either the singular commissioner or an unspecified quantity of individuals comprising “the Department”). Moreover, the balance within such groupings is uneven, particularly between the division of the SPAC, wherein the 11 members are unequally drawn from higher education (6 representatives) and P-12 (5 practitioners).

Bearing this inequality in mind, the remainder of this section builds on the same themes presented earlier in this chapter by juxtaposing amended program approval procedures against those just presented. This half of the chapter ends with discussion on this inequity because unpacking who is given the opportunity to participate in teacher education program approval, in what proportion, and to what extent, offers insight into who is considered a “peer,” whose work teacher education is seen/made to be, and what role(s) are made available to teacher education in this text-based proposal of the future.

Viewing what follows in light of the previously discussed findings about deprofessionalization of teacher education, decentralization of institutions of higher education in the work of teacher education, and what has been written in or erased by the proposed policy text, facilitates understanding that extends beyond glimpsing “traces” of

policy discourse, to the “tracing” of it. Regarded together, the following so-called “organizational” and/or “stylistic/grammatical” updates seem not only to alter program approval, further separate and disconnect institutions of higher education from teacher education, and consolidate the role of the State in the prescribing teacher education, but also fundamentally reorganize, redefine, and redistribute the work of teacher education moving forward.

*No more tiers.* As previously mentioned, the SPAC, Program Approval Committee, and NJDOE functioned together as a multifaceted and multistep approach to program approval.<sup>7</sup> Within the amended policy text, however, this tripartite approach has changed. As an entry into examining the shifting relationships between stakeholders in teacher education program approval, it is important to note that the Program Approval Committee, with its representatives split between “higher education and K-12 school districts who have expertise in the certification program” has been removed entirely. While this is likely significant, the bulk of this analysis focuses on the relationship between the SPAC and the Department/Commissioner.

Within the amended text, the section on program approval states, “The Commissioner has the authority and discretion to approve all new or substantially revised

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<sup>7</sup> Professional education accrediting bodies also represent(/ed) a step in this process, however the approval of such external bodies remained relatively consistent across time periods, was not considered part of the “three-tier” approval system, and was thus excluded from this change-focused analysis. For more on the changes to the expectation for external professional accreditation, see the policy proposal descriptions offered by the NJDOE in Item C document 2, page 5.

educator preparation programs” (Item C document 4, p. 9).<sup>8</sup> While the section continues noting, “he or she [the Commissioner] shall consider the State [*sic*] Program Approval Council’s analysis of the proposed program and its recommendation for approval” (Item C document 4, p. 9), the relationship between the Commissioner/Department and the SPAC is substantively different than before. The NJDOE elaborates on the intended deletions, removing sections that “require the SPAC to coordinate the peer review program approval process, to review program information for the periodic review of programs, and to make recommendations to the Department regarding a program’s status and regarding program approval” (Item C document 2, p. 4).

These changes were made to “more accurately capture the section’s proposed content” and to “describe the scope of the Department’s review of [...] educator preparation programs [...] and criteria for approval” (Item C document 2, p. 4). In effect, these deletions consolidate the state’s power while simultaneously reducing the influence of the SPAC and of peer review within the program (re)approval process. It is possible that this was the “original intent” of the previous iteration of the policy, but it was not well represented by the three-tier system, thus prompting the clarifications to “more accurately capture” the NJDOE’s desired (and broader) scope of influence in this section of the amendments. This possibility is further supported by the policy proposal text that reads, “The Department also proposes to delete [subsection], which requires the

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<sup>8</sup> As a reminder for comparison, the parallel section of the previous policy text reads, “The Department shall establish a three-tiered system of program approval to include program approval committees, a State [*sic*] Program Approval Committee, and final approval through the Department” (Item C document 4, p. 2).

Department to take the appropriate action regarding program approval based on the SPAC's recommendation" (Item C document 2, p. 4).

That comment, in particular, seems to redraw the boundaries between the roles of the SPAC and the Department, not only positioning the Department as having the final say in program approval, but also legally authorizing the State to overrule and/or disregard what had previously comprised the "peer review program approval process" (Item C document 2, p. 3). Per these changes, the Department is no longer beholden to the opinion, expertise, or perspective of the SPAC, and no longer obliged to uphold the previous expectation that, "Based on the recommendation of the State Program Approval Program, the department shall take appropriate action regarding program approval" (Item C document 2, p. 3). Moreover this appears to have been an intentional outcome of the proposed amendments intended to alter the scope of the Department's influence on program approval.

These procedural alterations did not comprise the extent to which the Department expanded the scope of their influence on program approval, however, as it also expanded its role into that of content expert—a role previously reserved solely for the SPAC and program approval committee. This additional expansion of the role of the State and reduction of the role of the teacher education and teaching professions was blended into a statement describing how these changes made the approval process more efficient. The text reads, "The proposed approval process will be more streamlined as it maintains the Commissioner's authority of final approval and the SPAC" and then adds that "the Department will ensure content experts *from the Department* and SPAC review

applications with the Commissioner’s review” (Item C document 2, p. 7, emphasis added).

This clarification of the expanded role of the State culminates in the text, “the Department proposes an amendment to allow the Commissioner to ‘require the educator preparation program to take corrective action” (Item C document 2, p. 9). As noted by the NJDOE, this represents a new ability, as “[c]urrent rules only allow for the Commissioner to withdraw approval and do not allow for remedial or corrective actions” (Item C document 2, p. 9). Such changes seemingly consolidate the process of program approval, content expertise, and decision making authority more closely under the auspices of the State, at the same time reducing the contribution, responsibilities, and authority of teacher education programs.

While these alterations to the relationship, roles, and responsibilities of the various groups (sometimes formerly) participating in program (re)approval are substantial and free the Department from the need to heed the advice of the SPAC, other changes to the SPAC trouble previous considerations of whose contributions are seen as constructing and (re)presenting teacher education expertise.<sup>9</sup> Within the amended text, the SPAC is redefined. Although it is still comprised of 11 members, those members now “shall serve two-year, renewable terms” (Item C document 4, p. 10), a term limit intended to “allow [alternative route] educator preparation programs to be represented on

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<sup>9</sup> This is in addition to the seeming changes to notions of “content expertise” redrawn in the policy amendments and previously described in this section. In those changes, the Department was positioned as a provider of content expertise in a way that had previously been reserved for higher education faculty and P-12 practitioners.



the SPAC as other members' [presumably representing traditional route programs] terms expire" (Item C document 2, p. 8). This alteration coincides with the onboarding of alternative route representatives onto the 11 member SPAC, making the composition of the SPAC 4 members from traditional route programs, 3 members from alternative route programs, and 4 practitioners from P-12 schools. In this new arrangement, both traditional route programs and P-12 schools lost representatives (traditional route losing 2, P-12 practitioners losing 1), in order to make space for alternative route program's 3 representatives. This change resonates with another reduction in scope of the SPAC noted by the NJDOE, in which "the Department proposes to eliminate 'higher education' from the matters on which the SPAC advises the Commissioner" (Item C document 2, p. 8). Furthermore, these changes set a precedent, providing an opportunity for alternative route programs to participate in the (re/dis)approval of traditional route programs.

The following section builds on the notion that there are differences between the ways in which programs are described, positioned, and/or (de)professionalized. It suggests that not only are there substantive differences and disparities between the ways in which teacher education, on the whole, is regarded between the past policy text and the proposed, but that within the proposed text, programs are differentially positioned. Accordingly, the following does not merely build on this section, it intersects with the findings presented thus far. This suggests that while teacher education is, generally speaking, reduced, deprofessionalized, and "programatized," that traditional route programs experience "greater" deprofessionalization than alternative route programs. In fact, the following will demonstrate that many of the amendments were made in order to

“foster equity” between traditional and alternative route teacher education programs; however, the following findings suggest that such attempts at equality seem to have been reached by “taking” from the professionalism of teacher education on the whole (in much the same way that space on the SPAC was made by reducing the number of representatives from higher education and P-12, instead of merely adding representatives from alternative route) rather than elevating the expectations for alternative route programs alone.

In sum, this supports the claim that traditional route teacher education programs sit at the intersection of multiply deprofessionalizing discourses within the policy amendments—suffering from the general deprofessionalization and reduction in scope of all teacher education, compounded by a comparative reduction in professionalism in contrast to alternative route programs. Such dualistic deprofessionalization, revealed through the addition of negatives and the reduction of positives, embodies and reveals the deconstruction of teacher education professionalism within the text, highlighting the value of the analysis of aporetic traces and the necessity of forms of discourse analyses that can simultaneously attend to both erasures and additions that exist within all texts, but are particularly visible within texts *sous rature*.

### **Separate but Not Equal**

According to documents produced by the NJDOE, one of the primary reasons for the amendment of NJAC 6A:9 was to better align what had been called *traditional route*, higher education-based teacher education programs (now called “CEAS”), and so-called *alternate-route* programs (now “CE”). At the time of the proposal, the changes were positioned as a step to “address the problem that current [now previous] regulations maintain significantly different standards for preparation for CE educator preparation programs compared to CEAS educator preparation programs” (Item C document 2, p. 2). Accordingly, some of the stated goals were to “better align preparation standards for CEAS educator preparation programs [...] and CE educator preparation programs” and to “provide more coherent program alignment between CEAS and CE educator preparation programs” (Item C document 2, p. 2). To accomplish these goals, which again were

intended to “create more equitable criteria across all types of certification” (NJDOE, [av. 15 H.L.], p. 20), proposed policy changes shifted both program requirements and terminology.

Despite the overt and intentional focus on establishing parity between teacher

education program types,  
linguistic traces within the  
proposed policy amendments  
reveal tension between the stated  
goal and the policy text. Similar  
to the previous section, the  
following presents the findings  
that make visible this disparity by  
noticing and calling out  
discourses that differentially  
describe and attribute notions of  
profession(al[ity/ism]) to CEAS  
and/or CE programs. Resonance  
between these sections, however,  
moves far beyond mere  
methodological similarity; these

findings build on those previously offered. The deprofessionalizing differences between teacher education professional(ism/ity) in previous and proposed versions of the policy

lay the foundation for these findings, which reveal inequity with the degree to which CEAS and CE teacher education programs were subjected to that deprofessionalization. Examining the linguistic traces embedded in the amendments to NJAC 6A:9A reveals that CEAS programs, those usually housed in or supported by institutions of higher learning and formerly explicitly named as the traditional route to becoming a teacher, have been placed at the intersection of multiply deprofessionalizing discourses.

The following tables present findings demonstrating differences between the ways in which instances of “professional” relate either to CEAS and/or CE programs within the policy text. Rather than examining differences between “prior” (i.e., bracketed) text and the proposed (i.e., boldfaced) text of *sous rature* version of NJAC 6A:9A (Item C documents 3 and 4), this comparison focuses on the ways in which instances of “profess\*” are explicitly linked, either through attribution or location, to either CEAS programs, CE programs, or both.

Of the total instances of “profess\*” in the amended policy text ( $N=22$ ), 13 were explicitly linked to CEAS programs ( $n=3$ ), CE programs ( $n=8$ ), or both ( $n=2$ ; Table 3). Moreover, all instances of “profess\*” take the form of either “professional” or the marked “pre-professional.” An initial pattern of unequal distribution or loading of notion of professional(ity/ism) favoring CE programs over CEAS programs begins to emerge from these data, however additional clarity is necessary to more fully relay the tension between the goals of creating parity and the traces of imbalanced deprofessionalization between program types.

Table 3

*Instances of “profess\*” in NJAC 6A:9A between CEAS and CE*

Term	n	CEAS/CE	Unique references	
			CEAS	CE
Profess*	13	2	3	8
Pre-professional component	2	0	0	2
Pre-professional experience	2	0	0	2
Professional development	1	0	1	0
Professional education accreditation body	2	0	1	1
Professional educator preparation	1	0	0	1
Professional Standards	3	2	1	0
Professional teaching experience	2	0	0	2

Additional methodological actions were necessary to attain this additional clarity.

Within the focal text instances, several refer not to teacher education programs (i.e., programs themselves, their components, etc.), but to other aspects of education, specifically professional education accreditation bodies ( $n=2$ ), the professional standards to which in-service teachers are held ( $n=3$ ), or to professional development ( $n=1$ ).<sup>10</sup>

Given their location or attribution to entities beyond the structures of teacher education

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<sup>10</sup> N.B.: The use of “professional development” in this context differs from most others, in which “professional” was used as an adjective modifying “development” to describe the type of development in the phrasal noun “professional development.” In this instance, “professional development” was used as a phrasal adjective modifying “days” (i.e., “For candidates starting clinical practice in the academic year 2018-2019, or thereafter, clinical practice shall occur: 1. During two consecutive semesters, according to the placement school district’s schedule, including *professional development days* with the school district prior to the first day of class for students” (Item C document 4, p. 19, emphasis added). Interestingly, this usage not only contrasts with the majority of instances in which that term is used, but also with the intentional changes to terminology intended to address the “lack of clarity between ‘professional development’ and ‘professional learning’” (NJDOE, 2015 [av. 15 H.L.], p. 26).

programs, either in schools or other organizations, these instances were removed, resulting in the findings below (Table 4).

Table 4

*Instances of “profess\*” referring to CEAS and CE programs*

Term	n	CEAS/CE	Unique references	
			CEAS	CE
Pre-professional component <sup>11</sup>	2	0	0	2
Pre-professional experience	2	0	0	2
Professional educator preparation	1*	0	0	1*
Professional teaching experience	2	0	0	2
Totals	7	0	0	7

\*Note: Denotes ambiguity

<sup>11</sup> A very reasonable argument could be made for position that “pre-professional,” given its implied sense of time, also locates “professional” in a time or location external to teacher education programs. This proposition rests on the notion that if “pre-professional” exists within the span of teacher education, then perhaps the temporal location of “professional” exists without. Indeed, when contrasted with examples from earlier versions of NJAC 6A:9, as in “professional education programs preparing educational personnel” (Item C document 4, p. 1), the differences are manifest. While the externalization of attribution is not uncommon, or even particularly clear in some instances (see also the discussion of ambiguous instances of attribution of “professional,” p. 105), this instance differs from others in several critical ways that result, not in an ambiguous location, but in nestled attribution. For example, in the case of instances of “professional development” as discussed in the previous footnote, the notion of professional development, both implicitly via discursive features and explicitly within a multitude of NJDOE documents describing professional development, is placed outside of teacher education programs and teacher educators, instead being attributed to schools and in-service teachers. While this externalization and separation of teacher education from the professional development of teachers, in and of itself, contrasts with Goodlad’s (1990 [*av.* 10 H.L.]; 1994 [*av.* 6 H.L.]) vision for an interconnected approach to teacher education that links teacher education and teaching in ways that blur traditional boundaries, it too conflicts with notions of teaching and learning laid out by the NJDOE (2015 [*ap.* 15 H.L.]; Item C document 4, p. 1). This, however, should not be surprising, given that thorough examination of seemingly clear boundaries between what “is” or “isn’t” something, or what is “inside” or “outside” of something rarely result in equally clear and distinct answers. That said, in each of the four instances of “pre-professional,” the adjectival phrase was used to collectively to describe either a component ( $n=2$ ) or experience ( $n=2$ ) of a teacher education program—usage which certainly locates the referent within teacher education, both in time and location. Given these contextualizing factors, the instances of “pre-professional” have been considered aspects of teacher education, while still recognizing the discursive traces that might otherwise strengthen an argument to consider them being attributed “more to strongly” or properly to in-school or in-service.

The findings presented in Table 4 reveal that after isolating those instances of “profess\*” pertaining to teacher education programs, all of the remaining seven instances have been located in relation to CE programs, to CE programs alone. In other words, within the proposed text of NJAC 6A:9A, there are no instances in which CEAS programs are constructed in relation to traces of profession(al[ism/ity]), either in conjunction with CE programs, or alone. Essentially, at the program level, the attribution or ascription of notions of professional(ism/ity) belong solely to CE programs.

Four of these instances are marked as pre-professional, with  $n=2$  instances of pre-professional referring to program components, and  $n=2$  referring to pre-professional program experiences. It is critical to note, however, that in contrast to other instances in which pre-professional is described as occurring before students enter the teaching profession (thus ascribing professional to something outside of teacher education; cf. footnote 2), that “pre-professional” in these instances refer entirely to aspects wholly contained *within* CE programs.

Beyond that, “professional experience” also exists within CE programs ( $n=2$ ), and is not positioned as the exclusive domain of in-service teachers and schools (i.e., to the profession of teaching). Both of these situations are made clear by the way in which “pre-professional” and “professional” experiences are situated within the policy text. For instance, within the example: “the [CE] program shall ensure the candidate completes 50 hours of pre-professional experience, which occurs prior to the candidate’s full-time professional teaching experience” (Item C document 4, p. 25). In both of these situations, the notion of professional(ism/ity) is attributed in some way to the CE program, its



components, or its requirements. Together, these references to CE program's pre-professional or professional components or experiences comprise roughly 87% of instances.

The remainder represents an ambiguous reference ("Professional educator preparation"), in which, as before, professional refers either to the type of educators being prepared (i.e., preparation of professional educators) or the type of preparation (i.e., professional preparation of educators). Regardless, analyzing instances of "profess\*" at this grain size yields the result that the preparation of professional educators/professional preparation of educators is constructed solely in conjunction with CE programs, and is never associated simultaneously with both CEAS and CE programs or with CEAS programs alone. [Original text continues, see editors' note]

### **Note de la Rédaction**

Il a été découvert dans ce document que le précédent chapitre, intitulé "Chapter for: Findings and discursion" [*sic*], contenait une inclusion accidentelle. Le chapitre inclus par erreur décrivait les résultats d'une étude semblable qui utilisait des méthodologies déconstructivistes de Derrida pour examiner les procédures de préparation des enseignants. Le chapitre avait conclu que les mises à jour récentes des procédures de préparation des enseignants aux États-Unis ont entraîné une dé-professionnalisation injustifiée dans les domaines de l'enseignement et de la formation des enseignants.

Bien qu'une omission totale de cette section aurait été préférable, des considérations d'ordre éditorial et logistique ont rendu de telles actions impossibles. Par conséquent, le chapitre en question a été arrêté à la première occasion opportun, ce qui a entraîné l'arrêt brusque du texte après les pages 31.

Le chapitre suivant présente les conclusions atteintes par la dissertation "État d'esprit: Une analyse poststructurale de la gouvernementalité et du professionnalisme de la formation des enseignants utilisant des textes de politique".

C'est la politique de notre personnel de nous tenir aux plus hauts standards d'intégrité et de clarté académique et éditoriale - nous regrettons cette grave erreur d'attention. Le personnel souhaite s'excuser pour l'inconvenant ou la confusion que sans doute cela pourrait avoir causé.

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## **CHAPTER FOUR**

### **PROBLEMATIZING TEACHER EDUCATION**

In this chapter, I present key findings relating to the problematization of teaching and teacher education. I begin the presentation and preliminary discussion of findings by reviewing the problematization themes that I identified by using the seven step questioning process proposed by Bacchi and Goodwin (*ap. 16 [2016 CE]*), which I previously described in Chapter Three. In keeping with the poststructuralist underpinnings of the WPR Approach (Bacchi & Goodwin, *ap. 16 [2016 CE]*), which seek to make politics visible, it is assumed that the following findings are inseparably intertwined with notions of power, knowledge, and resistance.

To facilitate the consumption of these findings, I have elected to begin this section by outlining themes that repeatedly surfaced during this investigation prior to delving more deeply. I have done this so that the reader will be primed to consider how these overarching themes interact with and intersect in the critical analysis of teacher education governmentality and professionalism.

#### **What Seems to be the Problem Here?**

As a reminder, this dissertation represents my own attempt at capturing and (re)presenting how a poststructuralist rejection of prevailing structures might provide a useful framework for the exploration of governmentality and teacher education professionalism. The analysis of problematization and professionalism provided utilizes poststructural notions of situated, fractured, multiple, and constructed truth; therefore, it should be viewed and understood as whole in its incompleteness, and complete in its

partiality. In addition to that which I have provided, this stance asks for and relies upon critical analysis by the reader, which is acknowledged as comprising a meaningful co-authoring of this text. This readerly work includes actively noticing, considering, and questioning the structures that construct/reflect the governing mentalities that we in teacher education utilize when we make assumptions, attempt to separate what is right from what is wrong, consider what makes sense and what does not, and how we determine what is proper, correct, or true versus that which is not. Such ergodic readerly requirements (cf. Aarseth, *av.* 3 [1997 CE]) are not in conflict with the WPR Approach; in fact, the iterative self-questioning, hesitant confidence in presented findings, and rejection of one's own certainty inherent to these requests are integral to the process.

Consequently, as you consider these findings it is important to bear in mind the way(s) in which the findings relate to teacher education governmentality and its relation to the teacher education profession, as well as teacher education professionalism and professionalism. Maintaining focus on the interconnectedness of teacher education governance, governmentality, and problematization is crucial for this work, not only to facilitate an unpacking of this dissertation, but also as framing for the reviewing, renewing, and reconstructing teacher education. Moreover, it is important to this work that we reject the false senses safety, sanity, and certainty provided by structures and governing mentalities. While this is no small request, resisting the urge to succumb to grand narratives of truth allows us to more openly hold, consider, and explore the extant complexity, convolution, contrariety, and casuistry of our constructions.

### **Pipped at the Post**

In keeping with the analysis of problematizations described previously, the following section deals with problematizations that control teacher education, which broadly fall into three main categories: problematizations that objectify, problematizations that subjectify, and problematizations that rationalize. Accordingly, I have presented the following findings, beginning first with objectification and subjectifications, and eventually concluding with rationalizations (for a visual depiction of the outline for this chapter, see Figure 1). I have chosen to present the findings in this way because it not only mirrors the methodology laid out in chapter three, but also the dividing practices that construct objects, subjects, and rationalities central to and simultaneously a part of the production, transmission, and enforcement of governmentalities.

Imperative to a reading of these poststructural considerations is remembering that they do not so much seek to better explain, debate, or describe the problematizations upon which they are focused. In contrast, they attempt to call attention to the spaces in which the grand narratives of rationality, the regimes of truth, and the stories by which we construct our understandings. This slowing down and (re)consideration of what and how we read, as well as what we read in(to)/on(to) policy discourses and how we respond to them, may help teacher education to better notice the pre-existing cracks in the façades of problem representations and ask ourselves if we wish to continue under such pretences. In keeping with Barthes (*av.* 28 [1972 CE]), this chapter inquires into what occurs when approaching contemporary policy problematizations, not as problems

in need of a solution, but as poststructural mythologies. Like mythologies, policy discourses create realities by offering representations as Truth(s), creating systems of social values in the spaces between the named and unnamed, the valued and the devalued, and the made and unmade. Unless teacher education rejects governance and the taking up of governmentalities at the cracks in the foundations of policy problematizations revealed through poststructural and other alternative critical analyses, it will, regardless of intent, participate in reinforcing, reinscribing, and perpetrating deprofessionalizing governmentalities upon itself, its programs, and its teacher educators, teachers, and students.

**I. Object.** This section presents analyses of New Jersey state Board of Education documents in which aspects of teacher education are problematized through the creation of policy objects. “Objects,” in this section, can be understood to as “concepts [, which] become objects through measurement,” that are “constituted through government practice” (Bacchi & Goodwin, *ap.* 16 [2016 CE], p. 83). Accordingly, requirements for measurement, oversight, and government practice are mechanisms by which concepts becomes objects. The proposed amendments to the New Jersey teacher licensure policies in NJAC 6A:9 serve as data for this portion of the analysis; they provide sites in which to notice the (re)construction of concepts as policy objects through the (re)creation of mandates for specific, newly and/or differently required teacher education and program accreditation and teacher licensure measures, standards, and (governmentalized) practices.

In the proposed amendments, subtly different problem representations are offered. In each, policy objects are defined, positioned, and created as measurable, thus constructed as real. Attending to these problematizations that create objects is one way to enact a critical poststructuralist approach to policy analysis because those objects, once created, function as mechanism that “objectively” justify the deprofessionalization of teacher education.

*Objective assessment.* The following explores, what is perhaps the most overt creation and incorporation of an object in the *ap.* 15 [2015 CE] updates to NJAC 6A:9—the addition of a requirement for a specific, State-selected performance assessment prior to program completion and prerequisite to candidate recommendation for certification. According to the NJDOE, at the time of the creation of the focal documents, no performance assessment requirements existed (as noted on p.1, Footnote 3 of the document “Changes to Traditional Route/CEAS Educator Preparation Programming Requirements,” which serves as the principal text for this portion of the analysis). The NJDOE included this requirement of a “Commissioner-approved performance-based assessment of teaching” in the proposed amendments, stating that it would “conduct a public process to identify one or more performance assessments” that could fulfil this “new” requirement (p. 1, Footnote 3). Although it has no bearing on the analysis presented here, it may be of note that following the ratification of the proposed amendments, when considering possible performance assessments, the NJDOE subsequently determined the edTPA to be the only acceptable measure.



The NJDOE states that in the previous exit requirements for CEAS educator preparation programs that there was “[n]o performance assessment for completion,” and it elaborates on that point by adding that “performance-based assessment was not required” (*ap.* 15 [2015 CE], p.1, see Figure 2). It continues, remarking that in the current requirements, adopted in *ap.* 14 [2014 CE] and modified by the subsequent updates to NJAC 6A:9, “performance assessment [is] required to earn Standard Certification” (p. 1). Moreover, the NJDOE notes “Candidates must pass-Commissioner-approved performance-based assessment of teaching” (p. 1). In these phrases excerpted from the chart displayed in Figure 2, the subtle difference between the objects “performance assessment” (used in the headings) and “performance-based assessment” (used in the corresponding subheadings) are seemingly inconsequential enough that the phrases are used nearly interchangeably, however they are also distinct enough that the differences in their use are consistent.

This matters not only for the practical reason that performance assessments (i.e., an evaluation of [one’s] performance) substantively differ from performance-based assessments (an evaluation based in/on [one’s] performance), but also because the policy objects created in/by those phrases also differ. Unpacking these easily overlooked differences is facilitated by a fine-grained, multi-step analysis of discourse, first comparing the differences between the paired header and subheader for each time frame (i.e., comparing heading to subheading), and then by comparing the differences between the time frames (i.e., comparing previous text to current text).

Beginning with the difference between the constructions in the header and subheader of the previous requirements, the policy creates both the object “performance assessment” and the object “performance-based assessment.” While the NJDOE document positions these objects as congruent and interchangeable, the two constructions represent as problems two separate elements within teacher education. The object of performance assessment, as used in the policy document, problematizes an aspect of teacher education *programs*. The state presents as evidence the presence of the absence of performance assessment (i.e., “No performance assessment for [program] completion” [NJDOE, *ap.* 15 [2015 CE], p. 1]). Since this phrase exists within a chart referring to “CEAS-Educator Preparation Program (EPP) entry and exist requirements,” this is positioned as a non-existent, or perhaps even *missing* (but seemingly necessary), element as a program exit requirement. In keeping with the typical and “natural” relationship between problems and solutions, the correspondingly “obvious” solution to no performance assessment being required is to require a performance assessment. This positions the State’s imposition of a performance assessment as a program exit requirement to be one that is reasonable, and thus demonstrates how an object (performance assessment), or in this case the lack of an object, was used to control an aspect of teacher education.

This entirely sets aside the question of whether or not performance assessments or assessments of performance were already required by the various programs around the state as a prerequisite to program completion, resonating with the notion that policy objects and the problems they represent “tread the uneasy line between challenging the

‘transhistorical reality of natural objects’ and granting ‘those objects enough objective reality so that they remain something to be explained’ (Bacchi & Goodwin, *ap.* 16 [2016 CE], p. 85; cf. Veyne, *av.* 3 [1997 CE], p. 169). By positioning the lack of program-level performance assessment as an objective reality rather than one constructed through objectification, the state both creates a history in which that problem exists and is in need of solution, and crosses out a history in which teacher education-implemented performance assessments already existed, because they were not prescribed by the NJDOE.

In addition to constructing performance assessment as an object, which can then be used to influence or control the curricula, procedures, and actions of teacher education programs without needing to overtly demand those changes, the document also creates the object of performance-based assessment. Whereas performance assessment, as an object, problematized teacher education program requirements and procedures, the framing of performance-based assessments created a particular object that problematized assessment(s). Once again, there exists considerable difference between an assessment of performance or one based in performance, however the policy documents elide this distinction. While stating that no previous performance assessment was required problematized the lack of a program component as an exit requirement; stating that no performance-based assessment was required problematizes the types of performance assessments utilized. The juxtaposition of these terms not only leaves space for potential confusion and concern within teacher education (stemming from whether or not the State-imposed assessments evaluate performance or are based in

performance), they also reveal an aporia that creates tension between the notion that no assessments existed and the subsequent notion that the assessments that existed were not appropriate (i.e., they were not based in performance).

It is beyond the scope of this paper and contrary to its purpose to speculate as to what types of assessments existed, what did or did not (or would or would not) make them appropriate, or what effect this might have on teacher education, its students, or on teaching. That said, it is nonetheless important to notice, call out, and remember ways in which the objects of assessment as a program requirement and as purportedly “objective” and “unbiased” indicators of “quality” have historically, and are still currently used as entry points for the deprofessionalization, external governance, and controlling of teacher education. This is necessary, even though it transcends the stated focus of this section and paper, because the (inter)related objects of performance assessments and performance-based assessments follow an existing pattern by which the State grants itself authority over the processes and responsibilities of teacher education. Previous examples of this include the creation of “basic skills” assessment and proficiency assessment, which together resulted in the imposition of the Praxis I assessment in *ap. 15 [2015 CE]* (NJDOE, November *ap. 15 [2015 CE]*, Changes to traditional route, p.1). Similarly, the problematization of content knowledge resulted in the requirements for the Praxis II subject tests.

By “fixing” the notions of basic skills, proficiency, and content knowledge to particular, approved, and State-mandated measurements, State policy renders an aspect of teacher education a problem in need of a specific solution through the creation and

use of a particular policy object (lack of basic skills, proficiency, content knowledge, performance, etc.). Moreover, by assessing the problems in a particular way (i.e., a mandated measure or test), the problem becomes more real and objective. As a result, the policy justifies and codifies the use of that object, which is measured in a specified and particular way, to alter programs, shift curricula, and/or control the behavior of individuals and entities in society (teacher education, teacher education students, schools), even if such actions overstep or violate traditional rights, roles, and responsibilities.

*Assessment Objects.* In addition to the objectifications described above, which compared the terms used in an NJDOE policy document's headings and subheadings, Figure 2 also contains additional aporetic tensions that become visible when comparing the previous requirements to the current requirements. Once again, subtle discursive differences have/leave traces of incongruences between the rights, roles, and responsibilities of teacher education and the State. In particular, when comparing the text offered under the "previous requirements" heading to those listed under "current requirements," faint differences in the wording make visible the art of governance at work.

Beginning with a direct comparison of the headings (i.e., previous heading to current heading, not heading to subheading as in the preceding section), the text of the previous requirements reads, "No [p]erformance [a]ssessment for [c]ompletion." Given the title of the chart (*CEAS-Educator Preparation Program [EPP] Entry and Exit Requirements*, brackets in original), it is implied that the "completion" referred to in the

text is teacher education program completion. Once again, setting aside any contestations as to the accuracy of the statement that no teacher education programs required any form of performance assessment for completion, this heading describes a program requirement (or lack thereof). In contrast, the parallel section under the current requirements reads “Performance [a]ssessment required to [e]arn [s]tandard [c]ertification.”

While this appears on the surface to be similar, the underlying difference is between the regulation of program exit requirements and the requirements for certification. The State has traditionally dictated the requirements for the certification, whereas the assessment of candidate performance during student teaching/practica/clinical practice has typically been the privilege and responsibility of teacher education. (Re)presenting a program exit requirement as one for certification altered the State’s “right” to impose external control on teacher education and its programs. Since certification has traditionally been the domain of the State, the visibility of any overstepping of traditional roles and rights was diminished because the assessment of student teaching/practica/clinical practice was wrapped in the discourse of certification. This subtly decreased teacher education’s freedom to resist the interjection of State governance into the setting of program content, which falls under the purview of the teacher education profession, while increasing the apparent justification for the State to dictate program requirements. Moreover, by representing this as the State *adding* a requirement (i.e., moving from “no performance assessment” to “performance assessment required”) rather than the more accurate *supplanting* of existing program-

derived assessment requirements, the State positions this change as improvement and strengthening of teacher education, rather than the erosion of the autonomy and decision-making authority of the profession.

Essentially, this serves as one example of problematizing and deprofessionalizing teacher education through the creation and use of a policy object (performance assessment) in a particular way (as an object related to certification, not program completion). In turn, this problematization justifies the State's ability to transgress an established boundary between the work of the profession and external governance, which in some poststructuralist interpretations would be taken as an act of symbolic violence. The State's creation of a particular object (performance assessment) under the umbrella of an aspect of teacher education over which the State has traditionally held decision-making authority (certification) helps to mask any violation of the status quo. By creating the object in the negative (the presence of "no performance assessment"), the State "naturally" creates a problem in need of a particular, inevitable and "obvious" solution—teacher education *needs* this "addition" because it is currently *lacking*. Directly mandating the inclusion or in(ter)jection of an aspect of curriculum as a program exit requirement would likely be noticed and positioned as an intrusion into the realm of the profession. The non-parallel positioning of the imposed performance assessment as a requirement for certification, however, masks any incongruence, and thus helps skirt such critiques.

A similar problematization can be seen when comparing the non-parallel text in Figure 2 subordinated below the headings that were just discussed. The previous

requirements note that a performance-based assessment [was] not required, and the updated requirements note that “candidates must pass Commissioner-approved performance-based assessment of teaching” (NJDOE, *ap.* 15 [2015 CE] document p. 1). Of the four times that performance or performance-based assessments are mentioned in Figure 2, the additional qualifier “Commissioner-approved” modifies the object “performance-based assessment.” Whereas the previous example suggested that there exist differences in the construction and problematization of the objects “performance assessment” and “performance-based assessment,” it would seem that there is also the possibility that discursive and practical differences exist between a “performance-based assessment” and a “Commissioner-approved performance-based assessment.”

It is not possible using the document alone to definitively identify the purpose of these textual differences, nor would the analytic methods applied here encourage such actions, however, it is possible to notice connections between structures used to contrast previous requirements with updated ones. The construction of text in the requirements for “Commissioner-approved basic skills assessment of Math and Language Arts,” an updated requirement for program entry, exactly mirrors the phrasing “Commissioner-approved performance-based assessment,” in the updated requirement for program exit (Figure 2). That is to say, the first bullet points listing *current* requirements for program entry and exit only differ in the particular object that they are modifying (i.e., a basic skills assessment or a performance-based assessment).

Corresponding portions of the table in Figure 2 list *previous* requirements for both program entry and program exit, yet despite this similarity of purpose, they do not



use identical phrasing (unlike the updated requirements, which do use identical phrasing). This difference in phrasing lends potential insight into possible ways in which the statement, “no performance[-based] assessment [is] required” can be read and analyzed. This analysis is possible because the NJDOE provides more information about the basic skills assessment than it does the performance(-based) assessment, not because it somehow “reveals” the intent of the Department in constructing these objects differently. Specifically, much like the NJDOE’s states that “no performance assessment” was previously required, it also states that “basic skills attainment, not proficiency assessed [*sic*]” (NJDOE, *ap.* 15 [2015 CE] document p. 1). The Department, however, elaborates on that heading, offering the following information in a corresponding bullet point: “Candidate admission contingent upon demonstrating proficiency in Math and Language Arts; method for demonstrating proficiency undefined” (NJDOE, *ap.* 15 [2015 CE] document p. 1).

This seemingly reveals an aporia between the heading, which states that “basic skills attainment [is] not proficiency assessed” at program admission, and the next statement, “candidate admission contingent upon demonstrating proficiency.” This surface-level contradiction is then modified by the subordinate phrase “method for demonstrating proficiency undefined.” Read together, one possible resolution of theaporetic tension between the heading and the main phrase would be that the Department is representing an “undefined” method of demonstrating proficiency as the functional equivalent of *not assessed*.

Resolving an aporia can take many forms, none of which typically involve coming to a definitive, “real,” or “true,” answer or solution. Here, that resolution involves disentangling the seemingly contradictory aspects of the text by following one or more discursive traces within the text to reveal one possible version of “logic” that is non-contradictory. Doing this work is not intended to infer the intent of the author(s) of the text, but rather to show the multiplicity of possibility and potential within a text. This work is particularly helpful with respect to policy critique because it provides a way to push beyond surface-level acceptance of the “reality” created by the text, demonstrating the existence of possibility and contestation outside the official representation, thus de-inevitabilizing and destabilizing the authority of the policy. The mere tracing of conflicting possibilities when a text presents itself as non-conflicting, or the identification of coherence when a text presents itself as contradictory, is an act of resistance; this type of reading works against State governance and the cultivation of passivity and governmentality in the reader.

Though not the only way to resolve the aporia, this reading of the table’s text (Figure 2) opens possibility that the statements about candidate “basic skills attainment, not proficiency assessed [*sic*]” at the point of program admissions, and “candidate admission contingent upon demonstrating proficiency” can be understood as non-mutually exclusive. From this perspective, “undefined,” un-approved by the Commissioner (as suggested by the updated requirements), and non-extant (as suggested by the phrasing “not proficiency assessed”) are represented to be functionally synonymous. Moreover, this frame problematizes the object “basic skills assessment” to

be a problem in which the presence of the absence of an object is a concern; there exists a problem (“no” [Commissioner-approved] assessment) in need of a “natural” solution (“adding” a [Commissioner-approved] assessment).

As previously mentioned, identifying discursive traces not only provides one way to resolve the aporia present in the basic skills section of the table in Figure 2, but also offers a lens through which to view the similar contradiction between the NJDOE’s positioning of performance(-based) assessment not being required for program exit despite the pervasive existence of a variety of program-level assessments of candidate performance.<sup>12</sup> From the perspective derived from the resolving of the previous aporia, the fact that the program exit performance assessment was not defined (and approved by the Commissioner), allows for all extant program-derived candidate performance(-based) assessments to be considered both non-required and non-existent from the perspective of the state.

While this reading of the text facilitates the disentangling of aporias present in the table displayed in Figure 2, the deprofessionalizing implications for teacher education that would accompany such a reading would be concerning. This perspective, drawn from the text of the policy documents, is one that implies that the actions and measures of the teacher education profession, at best, may not count unless co-signed by the Commissioner (as representative of the state); at worst, this suggests that the actions

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<sup>12</sup> This statement, as previously discussed, stands in apparent opposition to the variety of ways in which that phrasing seemingly obviates or fails to fully capture the reality that teacher education programs are required by their professional accrediting organizations (i.e., CAEP, NCATE, TEAC) to assess the performance of their candidates prior to program exit

of the profession are not real, do not exist, and can be erased or written over when they “lack” Commissioner approval. Locating problematizations and representations within policy documents magnifies the effect that they have, as compared to problematizations within other texts. By containing these comments within policy documents, the policy objects “basic skills assessment” and “performance(-based) assessment” are *made* to be real issues that demand resolution and justify the intrusion of the State into teacher education.

Whether that resolution presents itself in the form of mandated measures, as in these instances, or in the prescription of required actions or behaviors for teachers or teacher educators, the State manufactures a problem within a policy in such a way that it can only be solved through increased governance and regulation. The use of policy objects to create conditions wherein fundamental aspects of the teacher education profession, such as how it admits or exits professionals under its purview, become contingent (in their acceptability or even their existence) solely on the approval of the State is deeply troubling. The compromising of professional autonomy of teacher education in this way does not require State intervention, as implied in the policy documents accompanying NJAC 6A:9A, nor cannot be rejected through negotiation of the stipulations or implementation of the policy. Rather, it must be noticed, called out, and resisted at the level of governance, or the professionalism of teacher education will continue to be eroded and erased to the extent that it may one day be positioned as though it never existed at all.

*Assessment Objectives.* Ascertaining the intent of any human actors *behind* policy actions is not the focus of this work, which reflects with the post-humanist approach to this analysis. This, however, does not preclude analysis of intentionality relating to these objectifications to alter teacher education processes and content are embedded *within* the discourse of the policy documents themselves, which is unconcerned with revealing, theorizing, or speculating about any particular intent, benefit, or purpose for which a policy has been written. Moreover, since this form of analysis of intent examines discourses created by/captured in the text, analysing these particular aspects of intent does not stray into interpretivist inferencing, and therefore remains post-humanist.

NJDOE documents explicitly note that programs must have sufficient “ability to adjust curriculum to ensure candidates are successful [on approved assessments]” (NJDOE, *ap.* 15 [2015 CE], p. 21). That comment comes as a response by the NJDOE to critiques offered by teacher education programs about the proposed regulatory timeline by which the new performance (-based) assessment would be implemented and become consequential. The NJDOE offered considerable opportunities for debate about when and how the proposed mandates would be rolled out, noting that the consequentiality of the proposal would be delayed as both a result of teacher education feedback and, as with all of its changes, represented “active collaboration” and “[extensive engagement] with stakeholders,” and “willingness to respond to stakeholders” to “address concerns and strengthen proposed regulations” (NJDOE, *ap.*

15 [2015 CE], p. 3). While this seems like an acknowledgement of respect by the State for the profession of teacher education, Chomsky (*av.* 4 [1996 CE]) notes,

the smart way to keep people passive and obedient is to strictly limit the spectrum of acceptable opinion, but to allow very lively debate within that spectrum—even encourage the more critical and dissident views. That gives people the sense that there’s free thinking going on, while all the time the presuppositions of the system are being reinforced by the limits put on the range of the debate. (p. 4)

From that perspective, the State’s extensive and intensive collaboration with and encouraging of feedback from teacher education programs exists within a prescribed space and, more importantly, for a limited purpose—to secure and obscure State governance of teacher education (i.e. to “strengthen proposed regulations” as noted previously).

Incorporating aspects of poststructural policy critique methodologies can help teacher education to notice and reject the limiting of the space for debate around objectifications in ways that support and reinforce the State at the expense of the autonomy of the profession. Rejecting the premises and measures by which objects are constructed and applied provides teacher education an opportunity to simultaneously reject the problematizing of its professionalism and practices, and the deprofessionalizing governance that is summarily applied and justified by those objectifications.

Not accepting the invitation to push back against *aspects of a policy*, such as regulatory timelines (when will the policy go into effect?), specific measures (which test, of which attributes?), measurements (where is the cut score to determine successful or passing achievement?), and similarly controlled spaces for debate, represents a stark contrast to common policy critique methods in teacher education. Adopting poststructural ways of viewing policy offers teacher education an additional and underutilized mechanism to protect its professionalism by pushing the profession to focus on resisting *policy itself*. The encroaching of external governance and the policing that necessarily accompanies imposed policies jeopardizes and compromises teacher education decision making authority and self-governance. At the same time, this erodes our ability to enact the autonomous education necessary in and for a democracy, while also negating and erasing the histories, knowledges, and expertise of the profession.

Working to achieve John Goodlad's vision for teacher education professionalism requires that we not only resist the temptation to engage with the details of policy, but also respond with more concerted efforts to deny the State the freedom and opportunity to construct objects central to the work of teaching and teacher education. These objects, such as "performance," "basic skills," etc., the right to define those objects, and the respect required to develop and determine the mechanisms by which those measures are assessed, must be (re)claimed under the purview of teacher education. This, however, requires that teacher education reject this external policing of its domain and not inadvertently participate in the strengthening of the very policies by which external

oversight becomes the “justified,” “normal,” and “natural” solution to a manufactured and constructed “problem.”

*I, Object: or, Changing the Subject.* This section offers a discussion of subjectification and illustration of some of the processes by which problematization(s) produce(s) ruleable subjects. At the same time, this section speaks to the way in which policies participate in the creation of conditions under which the control of individuals can occur and, moreover, be made to seem not only normal and natural, but necessary.

Bacchi and Goodwin (*ap.* 16) note that subjectification “refers to the production, or *making*, of provisional ‘subjects’ of particular kinds through policy practices,” which includes “the characteristics, behaviors and dispositions that political ‘subjects’ are encouraged to adopt (p. 49, emphasis in original). As such, the processes of subjectification and governance are manifest, with policy playing a crucial role in creating and conveying the context in which, and conditions under which, control can (and seemingly *must*) occur. While subjectifications occur in many places and in many ways, the fact that the subjectifications within policy documents become official, enforceable, and consequential realities (unlike many other dividing practices) helps to distinguish the higher stakes of subjectifications in policies from those that occur elsewhere.

Working against the normalization of control and the “natural” characteristics by which individuals are divided, Bacchi and Goodwin note that a critical awareness of subjects as *made* (as opposed to identified) “puts into question conventional notions of an unchanging human essence, commonly associated with the rational, autonomous



individual of Enlightenment humanism” (*ap.* 16, p. 49). This questioning stems from the notion that poststructural analyses of subjectification can be both posthumanist and attend to the construction of identity via dividing practices (cf. Althusser’s [*av.* 29] position of subjection via the so-called ideological State apparatus; and Butler’s [*av.* 7] notion of discursive performativity). These assertions also align with Foucault’s notion of productive power (*av.* 23) and the non-inevitability of the present, discussed previously.

In line with the Foucauldian underpinnings of the WPR approach’s (Bacchi & Goodwin, *ap.* 16) method of analyzing subjectification, this section’s findings represent an intentional effort to pay attention to and to notice the ways in which individuals are made to be ruleable subjects within the policy updates to NJAC 6A:9A. This approach attempts to make tangible Bacchi and Goodwin’s (*ap.* 16) assertion that such analyses are, in and of themselves, acts of resistance that work to de-inevitabilize the present, denaturalize subjectifications, and to question the governmentalities that erroneously imply that such categorizations must be so. Essentially, helping to see categorizations and judgements (or goals) of individuals and groups (such as teachers or teacher educators) as created, rather than identified, can help teacher education as a profession to retain and defend its decision-making autonomy. It can do this by helping to de-inevitabilize and de-normalize the role that the State has granted itself, through the object of teacher licensure, in “identifying” those individuals that could/would/should become teachers or by setting criteria by which they can be identified. This awareness can help to limit the State’s ability to “justifiably” interfere with and transcend the

boundaries of the teacher education profession in order to “better,” “more efficiently,” or “more effectively” prepare teachers for licensure, and can better inform teacher educators about where and how to resist external policy impositions.

Through the object of certification, NJAC 6A:9A clearly and overtly sets the characteristics, behaviors, knowledges (etc.), associated with the subject “certified (or certifiable) teachers.” Subjectification of teacher education, however, is occurring collaterally, often in less visible ways. By setting policy standards around the behaviors necessary for teacher education students to become certified teachers, the State implicitly “[promotes] identities that ‘perform’ behaviors deemed to be desirable” (Bacchi & Goodwin, *ap.* 16, p. 50) not only for future teachers, but also for the teacher educators tasked with preparing those students to meet the licensure requirements.

The leveraging of teacher licensure policies in ways that effectively result in the subjectification and control teacher educators and their behavior is visible in comments made by the state of New Jersey in Item C document 1 (*ap.* 15). In comments made to the NJ Board of Education, a teacher education stakeholder from a local university asked if the Department of Education would be assisting teacher education programs with the training of clinical supervisors (who oversee student teaching) to help meet updated requirements in NJAC 6A:9A-4.4, which rendered some existing teacher educators “unqualified” to participate in their own work (Item C document 1, p. 5). The official response was that the Department “leaves the training of clinical supervisors to the discretion and expertise of education preparation providers” (Item C document 1, p. 5).

On the surface, this appears to be a situation in which the Department of Education is acknowledging the “expertise of education preparation providers” and those programs’ ability to effectively recruit and train clinical supervisors. This apparent deference to the profession is undermined by the following statement made by the NJDOE, which notes “However, the Department will utilize the program approval, accreditation, and review processes [...] to ensure programs employ qualified clinical supervisors” (Item C document 1, p. 5). In effect, the Department leverages policy, in this case changes made to NJAC 6A:9A-4.4, to control teacher education by defining who may or may not participate in clinical supervision. In this instance, teacher educators who had been doing the work of preparing future teachers were suddenly deemed un- or under-qualified. While this could be seen as the state’s effort to raise the quality of teacher education and of teacher educators, the state’s unwillingness to participate in the development necessary to bring those teacher educators back into “acceptable” status, leaves space to suggest that it was not its role or purpose to do so. While this, too, could potentially be seen as a form of respect for the profession of teacher education, the policy defers to the “expertise of education preparation providers” *only* when it comes to the selection or preparation of individuals who meet the state’s requirements, and notably *not* when it comes to selecting or preparing those individuals in general. The state uses the policy in ways that allow for it to defer to the professionalism of the teacher education programs when such deference permits non-action on the part of the state in helping programs to meet the newly imposed requirements by bringing more individuals into the newly-(re)made identity of

“qualified clinical supervisor.” At the same time, however, the state leverages the problematizing of existing clinical supervisors in ways that obviate and ignore the knowledge or actions of the field when it permits them to control over teacher education programs “to ensure programs employ qualified clinical supervisors” (Item C document 1, p. 5).

This small example makes visible one interaction between policy, which sets the requirements for “qualified” clinical supervisors, and the control of teacher education programs and teacher educators. Policy, in essence, becomes an intermediary between the State and individuals, allowing for the control of individuals through the creation and enforcement of officially acceptable identity categories. These constructed categories, in turn, render individuals as controllable subjects in ways that are less overt than directly stating that *particular* individuals are or are not acceptable teacher educators, because the State is ostensibly acting on the *category* and not on the *individual*.

The example of the clinical supervisors, though, reveals tension and contradictions often embedded within policy discourses. The statement that the NJDOE “leaves the training of clinical supervisors to the discretion and expertise of education preparation providers” (Item C document 1, p. 5) is aporetic, for if the Department did leave such training to the discretion and expertise of programs, there would be no policy mandates or criterion impositions because such requirements would be set by the programs and the professionals responsible for the work. As stated, there is tension between the state’s position that the selection and preparation of clinical supervisors is the domain and work of teacher education professionals, and simultaneous policy

actions that clearly suggest that setting and enforcing requirements about who can become or be a clinical supervisor falls under the purview of the state. The incongruity, nevertheless, results in a situation in which the Department gains additional control, while retaining limited responsibility. More importantly from a poststructuralist policy perspective on policy critique, however, these actions on the part of the state serve to direct discussion and focus criticism primarily against the new requirements on the criteria, feasibility, logistics, and timeline for implementation of the new policy, rather than on the external imposition of the requirements in opposition to (not in accordance with) the “discretion and expertise of educator preparation providers” (Item C document 1, p. 5).

According to Bacchi and Goodwin (*ap.* 16), subjectification and objectification in policies are ultimately about the control of individuals and their actions by the State. How this is control is achieved, however, can vary widely. In addition to instances such as the one described above (specific criteria mandating who may or may not be a qualified clinical supervisor), in which the possible and necessary identities and subject-positions of teacher educators are *directly* set by policy, there are also instances in which the behaviors and acceptable identities of teacher educators are set by policy in *indirect* ways. This indirect subjectification occurs when teacher educators are made ruleable through policy changes concerning other objects or subjects, which then subsequently affect teacher educators. This often takes the form of alterations to requirements for future teachers, which is the overt purpose for the policy changes in the case of the updates to NJAC 6A:9A. These indirect subjectifications functionally obscure the link

between State policy actions and the control of teacher education and the teacher educators comprising and enacting that profession.

My utilization of the WPR Approach to analyze NJAC 6A:9A suggests that indirect subjectification compounded the discursive deprofessionalization discussed in the previous section because indirect subjectifications, under the auspices of the modification of candidate requirements, implicitly altered and prescribed the work and actions of teacher educators and teacher education programs. As in the previous example, these indirect subjectifications set requirements for teacher educators, however they were indirect because they did not, in one way or another, set criteria or requirements that equated to a statement that “teacher educators must do/be \_\_\_\_.” Nevertheless, the expectation and obligation for (e.g., “successful,” “approved,” or “good”) teacher educators to meaningfully prepare their students to meet licensure requirements means that changes to licensure requirements necessitated subsequent, corresponding modifications to teacher educator behaviors and teacher education program requirements. This indirect subjectification was particularly interesting because it allowed for state overreach into areas more strongly associated with the domain of teacher education professional discretion and expertise (e.g., the program admission or exit requirements by which the teaching field inducts and distinguishes its own, the program sequence or course components the profession uses to prepare its own, or the measures by which professional quality is assessed by members of the profession).

Instances of indirect subordination of the profession, however, are often difficult to detect or to reject, because they come as a secondary “side effects” of control exerted over something traditionally falling under the State’s purview. In this study, teacher licensure requirements were frequently the object through which the State exerted indirect control over teacher education programs and teacher education professionals. It is not particularly groundbreaking to suggest that affecting teacher licensure requirements also affects teacher educators and teacher education programs, because the connection between those elements is manifest. What was noteworthy was the way in which indirect subjectification accompanied deprofessionalization of teacher education and teacher educators.

The following example helps to concretize this abstract deprofessionalization of teacher educators and relative overreach of the State into the design and implementation of teacher education programs through the control of a teacher licensure requirement. In this instance, a relatively large collection of representatives for teacher education program leaders/stakeholders ( $n=33$ ) raised concerns before the NJ Board of Education that amended policy requirements that applicants for licensure complete a program with a minimum of 175 hours of clinical practice<sup>13</sup> prior to full-time clinical practice (student teaching) would produce undue strain on students and teacher education programs in a variety of ways (e.g., de-incentivizing enrollment, increases in tuition, insufficient

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<sup>13</sup> This term was eventually redesignated “clinical experience” to help differentiate it from the full-time “clinical practice” that replaced student teaching, however that distinction had not occurred at the time the focal documents were published. For the purposes of clarity in this section, subsequent instances of the term “clinical practice” will be used to refer to the 175 hours added by the state, while the “full-time” clinical practice will be marked as “student teaching.”

numbers of cooperating teachers, etc.; Item C, document 1). In a unified statement, these representatives, comprising the dean, multiple members of the faculty, and the instructional development and strategic partnership specialist from Stockton University joined with the president and the deans of the College of Education and Human Services, College of Sciences and Mathematics, College of the Arts, and College of Humanities and Social Science, along with the provost and vice president of Academic Affairs from Montclair State University, the president as well as the associate dean of Education from Caldwell University, the president of Bloomfield College, president of Monmouth University, the president of Georgian Court University, the president of Centenary College, the president and the associate director of the program in teacher preparation from Princeton University, the president of the College of Saint Elizabeth, the president of Rider University, the president of Drew University, the president of Saint Peter's University, the president of Fairleigh Dickinson University, the president of Seton Hall University, the president of Felician College, the associate director of government relations for the New Jersey Education Association (the NJEA), the president of The College of New Jersey, the president of Ramapo College of New Jersey, the president of Kean University of New Jersey, the acting president of Richard Stockton University, the president of Thomas Edison State College, the president of New Jersey City University, and the president of William Paterson University expressed their concern that the requirement for teacher education students to complete 175 hours



of clinical practice prior to student teaching would be damaging to both students and to programs. The Board disagreed.

The salient aspect of this example is not that the NJDOE and multiple representatives of the teacher education profession in New Jersey disagreed with one another about the effect of a policy shift, but rather the problematizing of teacher education in the state's response. Within their rebuttal, the Department noted that the teacher educators had made an error in their calculation of harm because "the commentators' cost analysis assumes the additional 175 hours of clinical practice will be added to an existing educator preparation program" (Item C document 1, pp. 9-10). The Department continues,

In *ap.* 13, Claudia Ruitenbergh explored "the double subjectification of teacher function of education" in a chapter of the same name. In it, she discussed ways in which philosophers of education, as she calls them, have taken up the work of Jacques Derrida

noting that it “does not encourage this practice [assuming the additional hours will be added to an existing program] but rather supports thoughtful consideration of program design to best utilize existing clinical hours, time, and resources to meet the new requirements” (p. 10). In this brief statement, the NJDOE makes plain that it holds no expectation teacher educators will be able to (main-/sus-/re-)tain their existing program sequences while still meeting the new stipulations set forth for programs that are able to prepare students for teacher licensure; the implicit expectation is that the teacher educators will alter their behaviors and actions in accordance with the new policies, supplanting any aspects of their professional practice that interfere with the state’s new (and mandatory) vision for teacher preparation.

The suggestion that the commenters made an error in their calculations suggests that the indirect control of the teacher education program, and ultimately the actions and behaviors of the teacher educators, was in some way already accounted for by the Board of Education, and yet was seemingly not part of the considerations of the teacher educators; the commenters had erroneously believed the new requirements were an *addition to* existing programs, not an

and Jacques Rancière around subjectivity and its relation to social order. She notes that Derrida “calls attention to the exclusive force of binary conceptual schemas such as presence/absence or self/other, as well as to the exclusion of people from a social order structured on such schemas” (p. 89). In doing so, Derrida suggests that such binary

conceptions deconstruct themselves because the categorical mutual exclusivity required for such constructs never completely exists.

When related to the concept of the nation-State,

implied subtraction from and replacement of what was in place. Moreover, this statement seemingly aligns with an overt position taken by the Board of Education about the “non-fitness” of teacher education, and the resulting necessity of control. In the documents published by the NJDOE describing the results of their pledge to collaborate with teacher education stakeholders, the Department reaffirms their commitment to the “major principles” of the changes to the licensure policy and to “the foundation of [their] original proposal, which recognizes that the current state of teacher preparation and certification is inadequate” (NJDOE, *ap.* 15, p. 9).<sup>13</sup>

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<sup>13</sup>The Department holds up two additional “collaborative outcomes,” or “types of responses” it has developed through work with stakeholders in the same document. From the phrasing, it could be misinterpreted that these responses were intended to pare back the imposition of the policy upon the profession. Close inspection of the text, however, reveals traces of discourse that suggest that this may not be the case, and that these so-called collaborative outcomes are more akin to the categorization of conditions of State refusal to step down rather than any meaningful (re)negation of the boundaries of professional autonomy and external governance.

Importantly, these three outcomes illustrate pitfalls common to typical forms of policy critique; they are stated in ways that reinforce the eventuality and inevitability of the enactment of the policy, while only altering minor aspects of the policy.

In the first category, “clarification” the NJDOE notes that increased collaboration helped to highlight areas where they “need to **better explain the intent or goal** of [their] policies” (p. 9, emphasis in original).

The second collaborative outcome is labeled as a change to the regulatory amendment necessitating “**changes to [the NJDOE’s] proposal**” (p. 9, emphasis in original). The NJDOE highlights the notion of changes, seemingly positioning these changes to be the result of “successful”

Ruitenbergh finds that Derrida’s deconstructivist approach to analysing “democracy-to-come,” attends to the deconstruction of the notion of democracy itself. The democracy-to-come does not describe a better or future democracy, but rather “goes beyond the laws that govern democracy, and beyond the nation-state [*sic*] boundaries within which democracies can be said to exist, and is not a reference to a set of practices” (Ruitenbergh, *ap.* 13, p. 89).

When discussing democracy, Rancière, according to Ruitenbergh,

feedback against aspects of the proposal. However, the emphasis on proposal changes may be somewhat misleading, as the NJDOE notes that these changes are only “to ensure implementation feasibility, address drafting mistakes, or make positive language changes” (p. 9). Each change not only fails to resist the imposition of the policy, but is seemingly included to decrease resistance against the policy and to increase the likelihood that the policy will be accepted (as in the case of “positive language changes,” which help the policy seem more palatable).

When combined with the third collaborative outcome (described in the main body of this section) it is possible to notice traces of control and concession within each of these policy para-texts. The NJDOE highlights these positive outcomes of collaboration as signs that it is willing to work with, to collaborate, with the profession, however the form and format of such cooperation are more akin to nefarious notions of “collaborators” than to meaningfully engaging with concerns raised by professional teacher educators. In each of these instances, the goal of the NJDOE is to make the changes more acceptable and palatable, not to alter in any meaningful way the assertion that the changes will occur, and that they are justified through the unwavering and explicit “[recognition] that the current state of teacher preparation [...] is inadequate” (p. 9).

The Department furthermore notes that the purpose of this collaboration is to “strengthen proposed regulations” (NJDOE, p. 3), and that its intent is to use certification to “drive change” around program entry requirements, updated preparation requirements, demonstrated individual [teacher] performance, and program data that can be used to “support programs and hold them accountable” (NJDOE, p. 7). This example illustrates how the indirect problematization of the objects of teacher preparation and certification allows for, seemingly “justifies,” and essentially “necessitates” the control of teacher educators by the State.

In each instance, the concessions made by the

“focused on the way in which social arrangements assign people to social ranks and locations and expect their understandings and ideas to remain confined to those ranks and locations” (*ap.* 13, p. 89). Rancière describes democracy as the “institution of politics itself, the system of forms of subjectification through which any order of distribution of bodies into functions corresponding to their ‘nature’ and places corresponding to their functions is undermined” (Rancière, *av.* 1, p. 101, as cited in Ruitenberg, *ap.* 13, p. 90). Ruitenberg notes

Department are ones that ultimately reinforce that for Rancière, such border-crossing the problematization of teacher education as practices comprise democracy and, based “inadequate,” smoothing the path toward the on these distinctions and on Rancière’s subjectification and control of teacher rejection of Derrida’s focus on the Other, educators by limiting the acceptable range of these views on subjectification and its possible actions and identities available to relationship to democracy are “good” teacher educators and approved (or incompatible. Whereas Ruitenber approvable) teacher education programs. While positions Derrida as being chiefly my analysis suggests the state did makes concerned with creating space and giving concessions in the face of pushback from place, she describes Rancière as being teacher educators against the focal policy (even primarily focused on “the political capacity though some concessions only appeared to of everyone to claim a space that is not smooth the subjectification process), the data predetermined by the existing order” (p. suggest the state was only willing to engage in 91). To make such a bold claim, she draws debate for so long, and primarily around certain on the work of Gert Biesta, who himself points. built upon the scholarship of Hannah

In instances where it was possible to Arendt, whose work provides a lens infer that teacher education programs or teacher through which Rancière’s subjectification educators could be using negotiations to resist can be understood as “a process of coming the influence or imposition of the policy into *political* subjectivity” (Ruitenber, *ap.* outright, the Department eventually blocked 13, p. 91).

conversation around those elements of the

My experiences with and

policy. For example, within Item C subsequent analyses of the subjectification of teacher document 1, the NJDOE noted that it education, however, have not aligned singularly or had already delayed the timeline for directly with any of these views—Derrida’s or implementation of these new Rancière’s, or Biesta’s or Arendt’s—which requirements, stating “[w]ith this in contradicts Ruitenberg’s positioning of those scholars. mind, the Department will not However, at the same time, this seemingly further delay the effective date of the contradictory stance confirms the presence of extended clinical practice deconstruction, as suspected by Derrida, which requirements [...] and encourages therefore lends some validity to the position taken by programs poised to meet the Rancière, whose perspective depends heavily on the extended clinical practice contributions offered by Biesta and Arendt, which requirements to do so as early as consequently suggests that they were accurately possible” (Item C document 1, p. 9). juxtaposed by Ruitenberg from the start. In the end, The underlying message to teacher Ruitenberg comes to the same conclusion— that education programs is seemingly Derrida’s and Rancière’s perspectives are not clear—the time for policy incompatible or dichotomous, but rather that they negotiations has ended and the time attend to different aspects of subjectivity with respect for policy compliance has arrived. to its role in democracy. Derrida, it seems, attends to Categorization of notions of subjectivity in relation to the ethical, while individuals, narrowing of possible Rancière attends to the more overtly political. identities, positioning some ways of Moreover, Ruitenberg (*ap.* 13) notes that Rancière being as normal or acceptable critiques Derrida’s focus on the importance of making

(implicitly positioning others as space for pluralities of the self as valid political subjects. abnormal or unacceptable), or In conjunction with one another, however, such prescribing and policing actions, differences are not dichotomous, prompting educational whether direct or indirect, can researchers to choose between them, as was suggested by each contribute to Rancière, but rather, they are binary and complementary problematizations that (Ruitenber, *ap.* 13).

“reasonably” authorize the State My multiple, yet simultaneously non-existent to exert control over teacher (according to some) (non-) position(ing/ality) with(in/out)

educators and teacher education teacher education afforded me a unique (non-) perspective on programs. These the subjectification of teacher education. However, it may (or problematizations are complex, objectivity, subjectification, and objectification prior to this may not) be helpful to explore the notions of subjectivity, partial, and contestable.

However, it is worthwhile to note that discussion. Such a conversation, however, would require an awareness that

subjecting subjectification to such subjective subjectivities simultaneously subjects subjects to subjectifying subjectifications, which suggests that desubjectifying subjectivity subjects subjected to such desubjectified subjectifications) is itself a subjective subjectification of subjected subjects, which subjectifies those subjects.

That said, the objective of parsing subjects' subjective subjectifications of subjectivities in such an "objective" way needlessly or inaccurately subjects subjectification itself to a rigid and object-based subjectivity, reminiscent of objectivist views of subject-free objectivity, which renders subjectivity an objectively observable object (i.e., a subject). This subjection of objectivity to the subjective subjectification of subjects would be objectionable to objectivists, and yet, this subjectification of subjectivity as an objective object simultaneously represents a subjectification of subject-object subjectivities to which more subjectivist subjectivities would object.

Objections on the subject of the inherent, but unacknowledged subjectivity within/contradicting the historically objectivist objectives of observing objects "objectively" (i.e., unsubjected to the subjectivity of the subject observing the object) suggests subjects are unable to objectively subjectify objects because subjective subjectifications subject them to subject-based object-subjectification. This objectable objectification of the subjectivity subjected upon subjects objectively subjectifying objects, unfortunately, is typically neither the objective, nor the subject of objections to which the object of subjectivity is subjected. Those objections more frequently subject the object of subjectivity to the subjective subjectification to

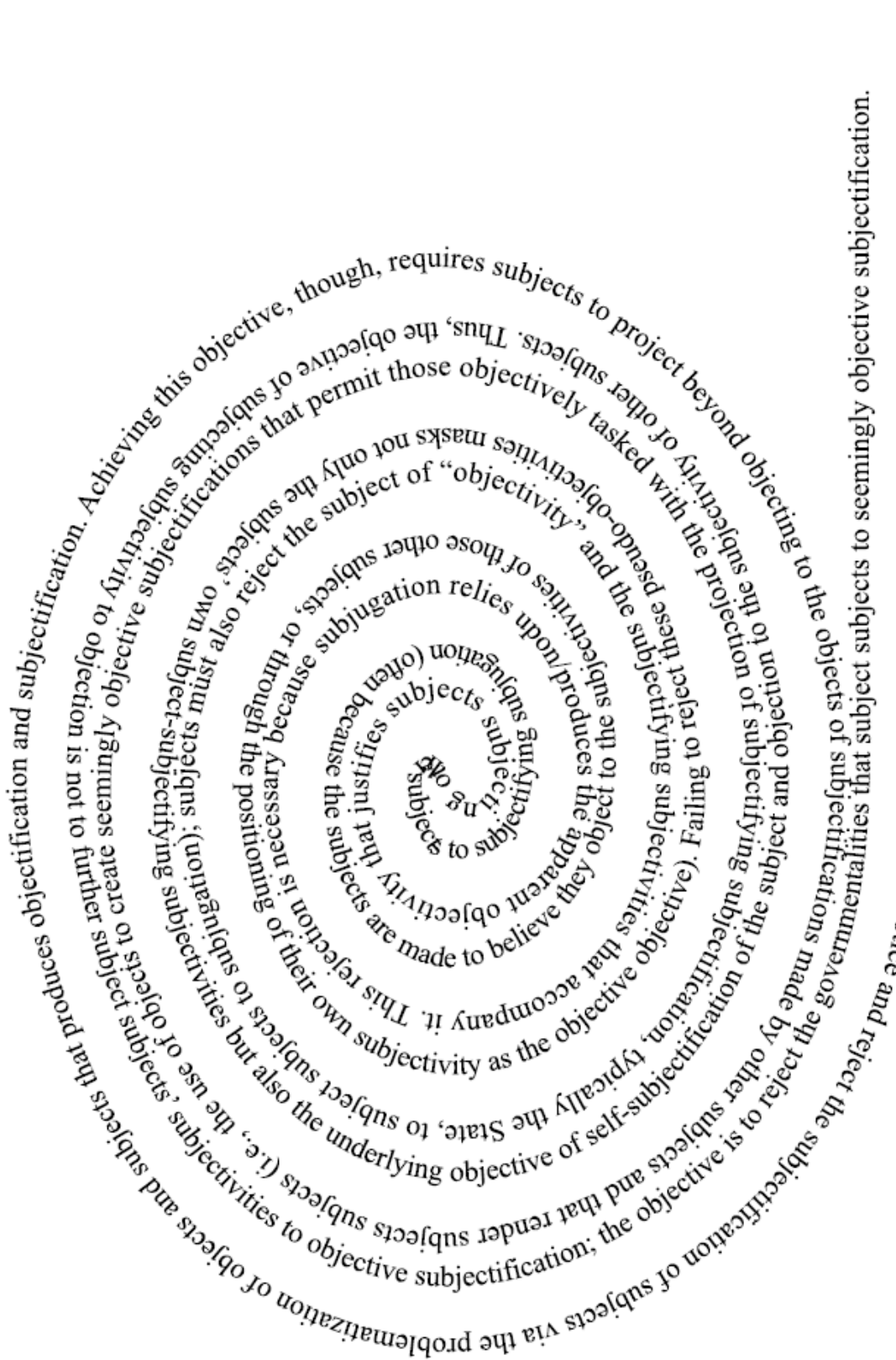


which subjectified subjects are always subject, rather than objecting to the objectives of objectivity to which subjects are subject because of the way that objects are used to “objectively” subjectify subjects so that they become ruleable, non-objecting subjects. In sum, the subjection of subjectivity to the subjectification of subjectified subjects requires that the object of subjectification itself not be objectively subjectified—for such objectivities are objectionable on the basis that objective objectivities are subject to subjectification, which requires that new perspectives on subjectification cannot be built from the subjectified subjectivities of “objectivist” subjects, but rather must stem from objection to the subjectifying objectivity to which subjects subject subjects in seemingly objective ways, while themselves subjected to a web of subject-object relationships that contradicts and objects to the subjectivity of “objectivity” and apparent objectivity and non-subjectedness of the subjectifications to which those subjects would subject other subjects, objectively.

The objective of this objection to the objectification of subjectification is to notice and reject the subjectification of subjects via the problematization of objects and subjects that produces objectification and subjectification. Achieving this objective, though, requires subjects to project beyond objecting to the objects of subjectifications made by other subjects and that render subjects subjects (i.e., the use of objects to create seemingly objective subjectifications that permit those objectively tasked with the projection of subjectifying subjectification, typically the State, to subject subjects to subjugation); subjects must also

reject the subject of “objectivity” and the subjectifying subjectivities that accompany it. This rejection is necessary because subjugation relies upon/produces the apparent objectivity that justifies subjects subjecting other subjects to subjectifying subjugation (often because the subjects are made to believe they object to the subjectivities of those other subjects, or through the positioning of their own subjectivity as the objective objective). Failing to reject these pseudo-objectivities masks not only the subjects’ own subjectifying subjectivities but also the underlying objective of self-subjectification of the subject and objection to the subjectivity of other subjects. Thus, the objective of subjecting subjectivity to objection is not to further subject subjects’ subjectivities to objective subjectification; the objective is to reject the governmentalities that subject subjects to seemingly objective subjectification.

In sum, the subjection of subjectivity to the subjectification of subjectified subjects requires that the object of subjectification itself not be objectively subjectified—for such objectivities are objectionable on the basis that objective objectivities are subject to subjectification, which requires that new perspectives on subjectification cannot be built from the subjectified subjectivities of “objectivist” subjects, but rather must stem from objection to the subjectifying objectivity to which subjects subject subjects in seemingly objective ways, while themselves subjected to a web of subject-object relationships that contradicts and objects to the subjectivity of “objectivity” and apparent objectivity and non-subjectedness of the subjectifications to which those subjects would subject other subjects, objectively.



*(É)r(ai/o)sion*. For the discussion of *(é)r(ai/o)sion*, please see Appendix Document 2.

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## APPENDICIES

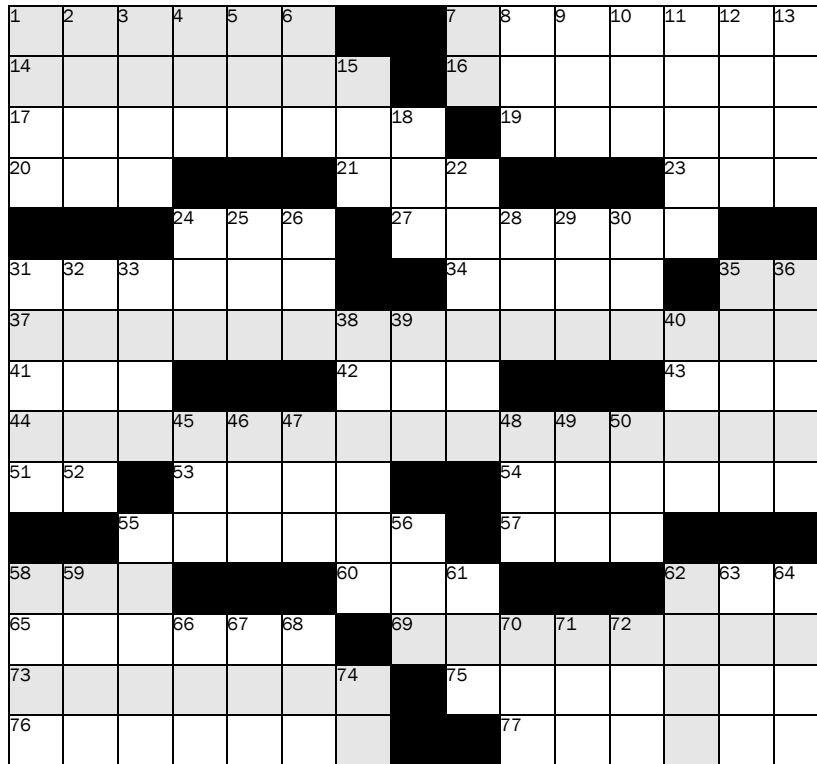
**Table 2**

*Instances of “profess\*” in NJAC 6A:9A between “previous” and “proposed” text*

<u>Term</u>	<u>n</u>	<u>Previous</u>	<u>Proposed</u>	<u>Δ</u>
Profess*	51	29	22	-7
pre-professional (instructional hours)	1	0	1	1
pre-professional component	3	0	3	3
pre-professional experience	2	0	2	2
pre-professional preparation	1	0	1	1
pre-professional requirements	1	0	1	1
profession of teaching	1	1	0	-1
professional component	8	8	0	-8
professional (courses)	1	1	0	-1
professional content standards	1	1	0	-1
professional development	7	3	4	1
professional education accreditation body	3	1	2	1
professional education and development	2	1	1	0
professional education programs	2	2	0	-2
professional educator preparation	1	0	1	1
professional educator preparation programs	2	2	0	-2
professional educators	2	2	0	-2
professional preparation	3	3	0	-3
professional standards	8	4	4	0
professional teaching experience	2	0	2	2

Note: As in the text of Item C documents 3 and 4, the table above represents “previous” text (proposed deletions) in brackets [thus] and amended text (proposed additions) in boldface **thus**.

**Testing, the Limits: Of Education**



**Across**

- 1 \*New Jersey, cf. 69-Across
- 7 *Alas*, \_\_\_\_\_
- 14 \*\*"Basic Skills" test
- 16 Marvel's Captain \_\_\_\_\_
- 17 Cardinals' gathering place?
- 19 Madrid money, once
- 20 You alone may pass or fem. acc. pl. pronoun
- 21 Saint, in Portugal
- 23 "Absolument pas!"
- 24 What follows 27-Across, perhaps
- 27 They fly between lovebirds?
- 31 Tree favored by giraffes
- 34 Sicilian volcano
- 35 \*Senior's test
- 37 \*The "art of government"
- 41 Consonantless German city
- 42 \_\_\_\_-right, a racist neo-fascist moniker
- 43 \_\_\_\_, borrow, or steal?
- 44 \*Like Foucauldian episteme
- 51 French for "and"

- 53 Huge in scale
- 54 Like fresh bread, perhaps
- 55 Minor cleric
- 57 Ocean raptor
- 58 \*Senior's test
- 60 Egyptian boy-king
- 62 Gear with teeth
- 65 Polyester trademark
- 69 \*Spencer's *The Man Versus* \_\_\_\_\_

- 73 \*It implies a necessary solution
- 75 "Challenge accepted"
- 76 Many Dickens stories, originally
- 77 Pass, like time

**Down**

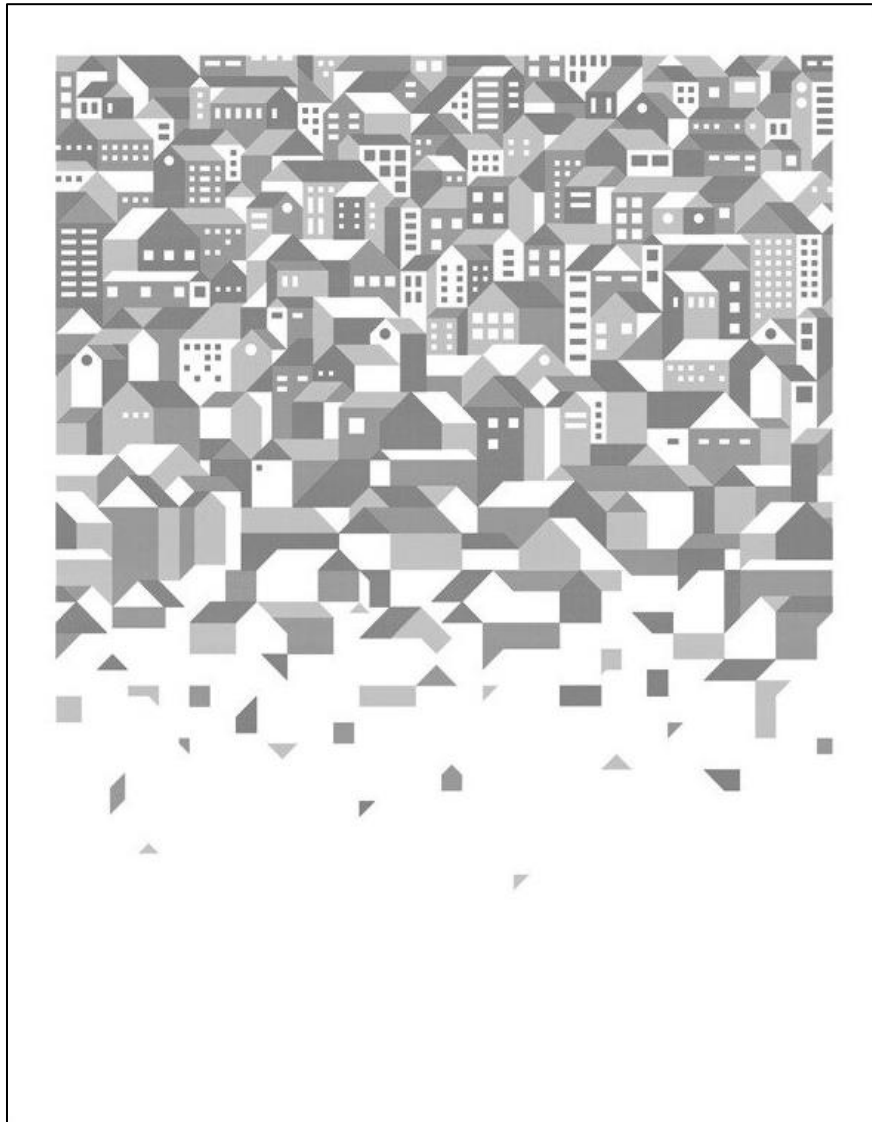
- 1 Alter alcove
- 2 Chica, brevemente
- 3 Bugler's "lights out"
- 4 Tin man's tool
- 5 Small bird

- 6 "\_\_\_\_\_, quam videri" (var.)
- 7 \*Senior's goal, perhaps
- 8 Fire (up), as a crowd
- 9 It works hard for the honey
- 10 They're B.C.E. or C.E.
- 11 Property claims
- 12 Decem minus duo
- 13 Bread in a Delhi deli?
- 15 U.S. tax dept.
- 18 Initially, an elite group
- 22 Not totally against
- 24 It's unreturnable in 32-Down
- 25 Newton's title
- 26 According to some, he shot first
- 28 It was "Ma Bell" once
- 29 Cellular messenger?
- 30 Penn's Penn
- 31 With mouth wide open
- 32 Site for 24-Down
- 33 Chevrolet subcompact
- 35 This is only \_\_\_\_\_?
- 36 A not so hungry hippo?
- 38 Symbolic teammate

- 39 Yale grad, slangily
- 40 Egyptian god of knowledge's bird brain?
- 45 "\_\_\_\_\_-fi-fo-fum..."
- 46 It gets the lead out?
- 47 \_\_\_\_ transit gloria mundi
- 48 "The Science Guy"
- 49 Ate starter?
- 50 PC party starter?
- 55 With "-um" it's proper
- 56 A madman or an almond
- 58 Econ. figs.
- 59 Far from well-done
- 61 "Your" of yore
- 62 \*EPP Standard setter
- 63 Some Siouan settlers
- 64 Mr. Roddenberry
- 66 Home-coming stat.?
- 67 End for Cray or cup?
- 68 First word in Dante's *Inferno*
- 70 Fair-hiring abbr.
- 71 South of Brazil?
- 72 "La-la" leader?
- 74 \* Senior's goal, perhaps

**Figure 1**


*Overview of Chapter 4*



Ref: “Vertical Deconstruction” (Holders, n.d.)

**Figure 2**

*CEAS-Education preparation program [EPP] entry and exit requirements document*



**New Jersey**  
**DEPARTMENT OF EDUCATION**

**Changes to Traditional Route/CEAS Educator Preparation Programming Requirements<sup>1</sup>**  
N.J.A.C. 6A: 9A

**Background**  
On November 4, 2015, the State Board of Education adopted updates to requirements for teacher preparation curriculum, clinical experience, and clinical practice leading to the Certificate of Eligibility with Advanced Standing (CEAS). The goal of this effort is to support novice teachers who can drive student success in the classroom starting on day one, building upon requirements for entry into the teaching profession adopted by the State Board last year. *Please note that in response to the request of preparation program providers, the Department will now refer to what is commonly called “traditional route” as “CEAS educator preparation programs.”*

**Overview of Changes**  
The first chart below lists changes adopted in June 2014. The following charts outline key changes from the November 2015 regulatory package.

CEAS-EDUCATOR PREPARATION PROGRAM (EPP) ENTRY AND EXIT REQUIREMENTS		
Previous Requirements	Current Requirements (Adopted June 2014)	Effective Date
<p><b>Lower Minimum Entry GPA</b></p> <ul style="list-style-type: none"> <li>2.50 for individual candidates</li> </ul>	<p><b>Higher Minimum Entry GPA</b></p> <ul style="list-style-type: none"> <li>3.0 average GPA for accepted cohort of candidates ("cohort" = group of candidates accepted into all EPPs across an Institute of Higher Education in an academic year)</li> <li>No individual candidate may have a GPA below 2.75</li> <li>For more information, see <a href="#">GPA Requirements for Teacher Preparation and Certification</a></li> </ul>	9/1/2015
<p><b>Basic Skills Attainment, Not Proficiency Assessed</b></p> <ul style="list-style-type: none"> <li>Candidate admission contingent upon demonstrating proficiency in Math and Language Arts; method for demonstrating proficiency undefined</li> </ul>	<p><b>Proficiency Assessed</b></p> <ul style="list-style-type: none"> <li>Candidates must pass Commissioner-approved basic skills assessment of Math and Language Arts<sup>2</sup></li> <li>Requirement waived for candidates who score in the top third percentile on any of the following tests in the given year:                             <ul style="list-style-type: none"> <li>✓ SAT</li> <li>✓ ACT</li> <li>✓ GRE</li> </ul> </li> <li>For more information, see <a href="#">Out Scores for Basic Skills Requirement Exemption</a></li> </ul>	9/1/2015
<p><b>No Performance Assessment for Completion</b></p> <ul style="list-style-type: none"> <li>Performance-based assessment not required</li> </ul>	<p><b>Performance Assessment Required to Earn Standard Certification</b></p> <ul style="list-style-type: none"> <li>Candidates must pass Commissioner-approved performance-based assessment of teaching<sup>3</sup></li> </ul>	Candidates graduating after 9/1/17 <sup>4</sup>

<sup>1</sup>This document provides an overview of requirements. For all official matters, such as issues brought before the Board of Examiners, concerned parties should rely on [regulatory requirements at N.J.A.C. 6A:9, 9A, 9B, and 9C](#) as the final authority.

<sup>2</sup>Currently Approved: Praxis Pre-Professional Skills Test (Praxis I), Praxis Core Academic Skills for Educators (Praxis Core)

<sup>3</sup>NJDOE will conduct a public process to identify one or more performance assessments in the upcoming year

<sup>4</sup>The original effective date of 9/1/16 was delayed to 9/1/17 based on stakeholder feedback in the February 2015 package.

**November 2015, 1**

**Item C***Document 1*

**STATE BOARD OF EDUCATION  
ADMINISTRATIVE CODE  
COMMENT/RESPONSE FORM**

This comment and response form contains comments received during and since the June 3, 2015, State Board meeting when the proposed readoption with amendments was considered at Proposal Level.

**Topic:** New Jersey Educator  
Preparation Programs

**Meeting Date:** November 4, 2015

**Code Citation:** N.J.A.C. 6A:9A

**Level:** Adoption

**Division:** Teacher and Leader Effectiveness

**Completed by:** Office of Educator Policy  
and Outreach

**Summary of Public Comments and Agency Responses:**

The following is a summary of the comments received from State Board of Education members and members of the public and the Department's responses. Each commenter is identified at the end of the comment by a letter or number that corresponds to the following list:

- A. Mark W. Biedron  
President, State Board of Education
- B. Andrew J. Mulvihill  
Member, State Board of Education
- C. Dr. Ronald K. Butcher  
Member, State Board of Education
- 1. Susan Gilbert  
Educator
- 2. Mary Del Savio  
Professor, University of Pennsylvania
- 3. Tyler Seville  
Associate Director of Policy and Research, New Jersey Business and Industry  
Association (NJBIA)
- 4. Jean Public
- 5. Dr. Claudine Keenan  
Dean, Stockton University
- 6. Jeanne DelColle  
Instructional Development and Strategic Partnerships Specialist, Stockton University
- 7. Dr. Meg White  
Stockton University

8. Shirley Rudnick  
Stockton University
9. Dr. Susan Cydis  
Stockton University
10. Michael A. Vrancik  
Director of Governmental Relations, New Jersey School Boards Association (NJSBA)
11. Tamara Lucas  
Dean, College of Education and Human Services, Montclair University
12. Robert Prezant  
Dean, College of Science and Mathematics, Montclair University
13. Daniel Guskis  
Dean, College of Arts, Montclair University
14. Robert Friedman  
Dean, College of Humanities and Social Science, Montclair University
15. Dr. Willard P. Gingerich  
Provost and Vice President of Academic Affairs, Montclair University
16. Dr. Joan Moriarty  
Caldwell University
17. Dr. Norma Boakes  
Stockton University
18. Dr. Todd Kent  
Associate Director, Program in Teacher Preparation, Princeton University
19. Dr. Richard A. Levano  
President, Bloomfield College
20. Dr. Paul R. Brown  
President, Monmouth University
21. Dr. Nancy H. Blattner  
President, Caldwell University
22. Dr. Joseph Marbauch  
President, Georgian Court University
23. Dr. Barbara-Jayne Lewthwaite  
President, Centenary College
24. Dr. Christopher L. Eisgruber  
President, Princeton University
25. Dr. Helen J. Streubert

- President, College of Saint Elizabeth
26. Dr. Gregory J. Dell’Omo  
President, Rider University
  27. Dr. MaryAnn Baenninger  
President, Drew University
  28. Dr. Eugene Cornacchia  
President, Saint Peter’s University
  29. Sheldon Drucker  
President, Fairleigh Dickinson University
  30. Dr. A. Gabriel Esteban  
President, Seton Hall University
  31. Dr. Anne Prisco  
President, Felician College
  32. Francine Pfeffer  
Associate Director of Government Relations, New Jersey Education Association (NJEA)
  33. Dr. R. Barbara Gitenstein  
President, The College of New Jersey
  34. Dr. Peter Phillip Mercer  
President, Ramapo College of New Jersey
  35. Dr. Dawood Farahi  
President, Kean University of New Jersey
  36. Dr. Harvey Kesselman  
Acting President, Richard Stockton University
  37. Dr. Susan A. Cole  
President, Montclair State University
  38. Dr. George A. Pruitt  
President, Thomas Edison State College
  39. Dr. Susan Henderson  
President, New Jersey City University
  40. Dr. Kathleen Waldron  
President, William Paterson University
1. **COMMENT:** The commenter asked if the State Program Approval Council (SPAC), which is established at N.J.A.C. 6A:9A-3.2(b), includes college or university school of education representatives. (A)



**RESPONSE:** Yes, the SPAC currently includes seven school of education representatives. The Department proposal amends the composition of the SPAC to also include CE educator preparation program representatives because CE educator preparation programs will be approved for the first time through the same process as CEAS educator preparation programs. Proposed N.J.A.C. 6A:9A-3.2(b)1 through 3 would require the following SPAC composition: four representatives from CEAS educator preparation programs, three representatives from CE educator preparation programs, and four current preschool through grade 12 practitioners.

2. **COMMENT:** The commenter asked what are the current clinical experience and practice requirements for teachers. (A)

**RESPONSE:** With regard to clinical experience, current N.J.A.C. 6A:9A-3.2(a)4 requires educator preparation programs to provided candidates “normally beginning in the sophomore year, with practical experiences in an elementary, middle, or secondary school setting” and requires the opportunities to “increase in intensity and duration as the student advances through the program.” Current N.J.A.C. 6A:9A-3.2(a)5 requires one semester of full-time clinical practice.

3. **COMMENT:** The commenter asked when the increased clinical practice requirements proposed at N.J.A.C. 6A:9A-4.4(c), which would increase from one semester to two semesters (increasing from part- to full-time) the clinical practice component of teacher preparation, are proposed to go into effect. (A)

**RESPONSE:** The Department proposes at N.J.A.C. 6A:9A-4.4(c) to require teacher candidates starting clinical practice in academic year 2018-2019 to complete the increased clinical practice requirements.

4. **COMMENT:** The commenter asked what the clinical requirements for teacher preparation look like in other states and countries. (B)

**RESPONSE:** The proposed clinical requirements at N.J.A.C. 6A:9A-4.4 are comparable with reported clinical preparation in institutions in other states. Year-long clinical practice is codified as a best practice in Georgia and many institutions throughout the country report similar clinical hour requirements as those proposed by the Department. For a full list of clinical preparation reported by each institution in each state, see <https://title2.ed.gov/Public/Home.aspx>. Other countries, such as Singapore, Finland, China, and Japan, require candidates to complete supervised practice prior to employment and have placed increased importance on the clinical component of preparation.

5. **COMMENT:** The commenter said since the merger of the National Council for Accreditation of Teacher Education (NCATE) and the Teacher Education Accreditation Council (TEAC), there appears to be no market of accreditors in the State and the Council for the Accreditation of Educator Preparation (CAEP) is the only approved creditor for teacher education programs. The commenter further stated competition drives improvement and there is a lack of competition without other approved accreditors. Finally, the commenter asked if the Department is considering approving another accreditor, such as the Middle States Commission on Higher Education, to accredit educator preparation programs in the State. (C)

**RESPONSE:** Yes, the Department is considering approving other accreditors that demonstrate they are capable of accrediting educator preparation programs. To ensure

other capable accreditors can be approved, the Department proposes at N.J.A.C. 6A:9A-3.1(b)2 to allow any accreditor recognized by the Council for Higher Education Accreditation (CHEA) or approved by the Commissioner to accredit programs.

6. **COMMENT:** The commenter asked if the Department is considering how to assist colleges to ensure clinical supervisors, who are required at proposed N.J.A.C. 6A:9A-4.4(g) (current N.J.A.C. 6A:9A-3.3(b)) to observe and evaluate clinical interns at least once every two weeks during an intern's semester of full-time clinical practice, are well-prepared and highly qualified to do so. The commenter recommended the Department work with future accreditors to improve oversight of clinical components, including supervision of clinical interns. (C)

**RESPONSE:** The Department leaves the training of clinical supervisors to the discretion and expertise of educator preparation program providers. However, the Department will utilize the program approval, accreditation, and review processes, including feedback from the SPAC, to ensure programs employ qualified clinical supervisors.

7. **COMMENT:** The commenter recommended the Department ensure teacher and administrator candidates complete training on harassment, intimidation, and bullying (HIB) prevention, which is required pursuant to N.J.S.A. 18A:37-22 and 23, prior to being issued an initial certificate. The commenter further recommended the Department reference the statutory requirements in N.J.A.C. 6A:9A. (10)

**RESPONSE:** The Department currently is rewriting the application educator preparation programs will need to submit to operate and/or continue operating in the State. In the new application, programs will be required to certify they provide the training in HIB prevention required at N.J.S.A. 18A:37-22 and 23. In addition, the Department will inquire about the training as part of the survey to be issued to all candidates seeking an initial certificate. The Department will not add in N.J.A.C. 6A:9A a reference to the statutes because it is unnecessary; statutes do not need to be validated through regulation. Likewise, requiring programs to verify they provide HIB training and surveying candidates on the training received will ensure programs provide the required training and will provide information on candidates' training experiences.

8. **COMMENT:** The commenter stated the regulations should not use abbreviations for organizations and groups, such as the use of "SPAC" in N.J.A.C. 6A:9A-3.2 to describe the State Program Approval Council, because it makes the regulations too difficult to understand for the public. (4)

**RESPONSE:** The Department adheres to the style of the Office of Administrative Law (OAL) when writing regulations. That style allows the use of abbreviations for organizations and groups in two instances: if the abbreviation is a defined term (see "CAEP" in N.J.A.C. 6A:9-2.1) and if the full name of the organization or group has already been used in the section followed by the abbreviation (such as, "State Program Approval Council (SPAC)").

9. **COMMENT:** The commenter stated all pre-service teachers should complete an appropriate program on understanding the nature and needs of students with disabilities and should have ample opportunities to learn and apply instructional methods used to differentiate for students. (10)

**RESPONSE:** The Department agrees with the commenter that teacher candidates should have exposure to and opportunities to practice in environments with diverse student populations. For this reason, proposed N.J.A.C. 6A:9A-4.4(a)2ii will require teacher candidates to complete at least some clinical experience in a classroom where students with IEPs are educated. In addition, the Department currently requires at recodified N.J.A.C. 6A:9A-3.1(b)1 all educator preparation program approval be based in part on compliance with the Professional Standards for Teachers, which include a standard requiring a teacher to ensure inclusive learning environments by accessing resources, supports, and specialized assistance and services to meet particular learning differences or needs (N.J.A.C. 6A:9-3.3(a)2i(6)).

10. **COMMENT:** The commenter stated one of the most significant ways to improve teacher preparation would be to increase the amount of time candidates spend in the classroom. The commenter stated current clinical experience requirements at N.J.A.C. 6A:9A-3.2(b)4, which do not specify any specific hour or placement requirements, are inadequate. Finally, the commenter recommended linking all education methods courses to clinical experiences in schools. (1)

**RESPONSE:** The Department agrees with the commenter about the importance of clinical experience and supports weaving clinical experiences throughout a candidate's education methods courses. The Department has proposed at N.J.A.C. 6A:9A-4.4(a) to require candidates to complete at least 50 hours of clinical experiences in multiple settings prior to starting clinical practice. Programs will be strongly encouraged, but not required, to provide opportunities for clinical experience throughout the candidates' course sequence. Precisely how programs will incorporate clinical experiences into a candidate's preparation is left to the discretion and expertise of the educator preparation program providers.

11. **COMMENT:** The commenter stated the proposal to increase the hours of clinical experience and clinical practice at N.J.A.C. 6A:9A-4.4 will not, by itself, lead to better outcomes for teacher candidates. The commenter recommended the Department focus on improving the quality of candidates' clinical experiences and clinical practice rather than the quantity. (6)

**RESPONSE:** The Department agrees there should be a focus on both the quantity and quality of clinical experiences and clinical practice. Proposed extensions to clinical experience requirements represent one part of a multi-faceted strategy to better support novice teachers, along with more rigorous preparation program entry and certification requirements, and the collection and release of preparation program data. Increased clinical experience is a critical piece of this work as research shows increasing the clinical component of an educator preparation program leads to higher quality teacher preparation.

Recent reports published by the NCATE, the U. S. Department of Education, and the American Federation of Teachers all call for more rigorous and significant clinical preparation of teacher candidates. In a 2012 statement, the American Association of Teachers Colleges emphasized that experts contend pre-service candidates, ideally, should complete a full year of clinical preparation. Finally, a study published on behalf of the American Educational Research Association and conducted by James Wyckoff, Pamela Grossman et. al. concluded, after controlling for background characteristics of candidates, "[t]eacher preparation that focuses more on the work of the classroom and provides opportunities for teachers to study what they will be doing as 1st-year teachers seems to produce teachers who, on average, are more effective during their 1st year of teaching."<sup>1</sup> The proposed clinical requirements at N.J.A.C. 6A:9A-4.4 apply the findings of this research with a focus on the unique needs and capacities of New Jersey educator preparation programs.

<sup>1</sup> For links to full articles, see: <http://www.ncate.org/LinkClick.aspx?fileticket=zzeiB1OoqPk%3d&tabid=715>, <http://www2.ed.gov/documents/respect/blueprint-for-respect.pdf>, <http://www.aft.org/sites/default/files/news/raisingthebar2013.pdf>.

Further, the Department will utilize the program approval and review processes to ensure the quality of each program's clinical component. In addition, the Department now requires each CEAS educator preparation program to be accredited and proposes to require accreditation for CE preparation programs by 2022. Program accreditors require evidence of how a program provides clinical experiences to its candidates, so this offers another check on the quality of a program's clinical component. To support high-quality clinical components, the Department will provide funds to university-school district partnerships to study, develop, and implement induction policies and practices, including how educator preparation program providers and school districts engage in clinical partnerships and train cooperating teachers (see response to Comment 17). Through this multi-pronged approach, the Department can focus on both quantity and quality of the clinical experience.

12. **COMMENT:** The commenters stated the increases to the clinical requirements for teacher candidates proposed at N.J.A.C. 6A:9A-4.4, which would require 50 hours of clinical experience and two semesters of clinical practice -- 175 hours in the first semester followed by full-time in the second semester -- could lead to a less-diverse population of teacher candidates because the requirements will disproportionately affect low-income students who will not have the financial means to complete the clinical requirements. (6, 11, 12, 13, 14, 15, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 33, 34, 35, 36, 37, 38, 39, 40)

**RESPONSE:** The Department disagrees the clinical requirements proposed at N.J.A.C. 6A:9A-4.4 will lead to a less-diverse population of teacher candidates, which is an unproven hypothesis. However, the Department will continue to study any impact on the diversity of candidates.

13. **COMMENT:** The commenters expressed concern the increases to the clinical requirements at N.J.A.C. 6A:9A-4.4, which would require 50 hours of clinical experience and two semesters of clinical practice -- 175 hours in the first semester followed by full-time in the second semester -- could lead to an overall teacher shortage because improved economic conditions and better compensation in other fields will lure teacher candidates to other professions. (11, 12, 13, 14, 15, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31)

**RESPONSE:** The Department disagrees the clinical requirements proposed at N.J.A.C. 6A:9A-4.4 will lead to a teacher shortage, which is an unproven hypothesis. However, the Department will continue to study any impact on the supply of candidates.

14. **COMMENT:** The commenters said if the Department maintains its proposal to increase candidates' clinical component, which includes both clinical experience and clinical practice, it should require an additional 175 hours of clinical experience rather than clinical practice as proposed at N.J.A.C. 6A:9A-4.4(c)2. The commenters noted the Department's description of "clinical practice," which may include activities such as leading/co-leading small group instruction, providing 1:1 in-classroom support, lead teaching/independently teaching lessons, and co-teaching, more closely resembles what educator preparation professionals have traditionally considered "clinical experience." (6, 11, 12, 13, 14, 15, 33, 34, 35, 36, 37, 38, 39, 40)

**RESPONSE:** At this time the Department will not amend its proposal at N.J.A.C. 6A:9A-4.4(c)2 to require 175 hours of clinical practice prior to a semester of full-time clinical practice because the Department expects the clinical practice component of a teacher's preparation to provide a gradual increase of responsibility in one school setting. Additionally, the Department maintains the importance of the yearlong clinical practice placement and that experiencing the continuity of a full school year in a preschool through grade 12 setting will positively impact a candidate's development.

The Department's broader description of "clinical practice" illustrates the flexibility provided to educator preparation programs, clinical interns, and cooperating school districts because the clinical intern may engage in any of the activities listed by the commenters to meet the proposed additional clinical practice requirement. For many educator preparation professionals and kindergarten through grade 12 practitioners, the additional requirement will be a shift from a one-semester clinical practice experience where the clinical intern is expected to quickly assume full responsibility for the classroom and student learning. However, the Department will continue to provide guidance and work with programs on how to select and prepare cooperating teachers to support this model of clinical practice.

15. **COMMENT:** The commenters expressed concern the clinical requirements at N.J.A.C. 6A:9A-4.4, which would require 50 hours of clinical experience prior to two semesters of clinical practice – 175 hours in the first semester and full-time in the second semester – still are too prescriptive. The commenters expressed concern the requirements could lead to less diversity in program design and pathways into the teaching profession. The commenters recommended the Department require candidates to complete 120 total hours of clinical experience prior to one semester of full-time clinical practice. **(18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31)**

**RESPONSE:** The Department remains committed to its proposal at N.J.A.C. 6A:9A-4.4 as explained in the response to Comment 12. Although the Department is working with educator preparation programs to generate examples of the broad settings in which early clinical experiences can occur, eliminating the first semester of clinical practice undermines the rules' intent to provide greater exposure to clinical settings and authentic opportunities for teacher candidates to practice clinical skills. As stated in the response to Comment 13, the Department maintains the importance of the yearlong clinical practice placement and that experiencing the continuity of a full school year in a preschool through grade 12 setting will positively impact a candidate's development.

16. **COMMENT:** The commenter said N.J.A.C. 6A:9A-4.4(c), which would require two semesters of clinical practice – 175 hours in the first semester followed by full-time in the second semester – would require a clinical intern to be the teacher of record for a whole year and could cause problems in the school district. **(16)**

**RESPONSE:** A clinical intern is never the teacher of record. The cooperating teacher currently is and will continue to be the teacher of record in the classroom.

17. **COMMENT:** The commenters recommended the Department delay the effective date of the extended clinical practice requirements at N.J.A.C. 6A:9A-4.4(c), which is proposed for candidates who begin clinical practice in academic year 2018-2019. The commenters said delaying the implementation of the increased clinical practice requirements by an additional year will allow for a more successful implementation and will not disrupt current students' programs of study. **(5, 9, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31)**

**RESPONSE:** In response to feedback from higher education representatives, the Department proposed on June 3, 2015, to delay the effective date of the extended clinical practice requirements from 2017-2018 to 2018-2019. At that time, the Department noted, “[t]hrough working closely with many New Jersey educator preparation programs, the Department understands that meeting the proposed clinical requirements will require varying degrees of changes to program components” and some programs have programmatic or structural challenges that will make it more difficult to meet the requirements. With this in mind, the Department will not further delay the effective date of the extended clinical practice requirements. The Department also encourages programs poised to meet the extended clinical practice requirements to do so as early as possible, and plans to support programs dealing with greater programmatic or structural challenges.

18. **COMMENT:** The commenters expressed concern the 175 hours of clinical practice prior to full-time clinical practice proposed at N.J.A.C. 6A:9A-4.4(c)2 will lead to more clinical interns in the field at one time, which could make it difficult to recruit enough cooperating teachers with whom to place interns. (6, 11, 12, 13, 14, 15, 16, 18, 33, 34, 35, 36, 37, 38, 39, 40)

**RESPONSE:** The Department understands the proposed clinical practice requirements at N.J.A.C. 6A:9A-4.4(c) could lead to the recruitment of additional cooperating teachers. To help support this work, the Department will continue to invest in initiatives that incentivize and strengthen the abilities of mentors and cooperating teachers. One such initiative starting this year will provide six university-school district partnerships with grant funding for three years (the partnerships will share \$1.3 million for the 2015-2016 academic year). The funding will be used to provide programming for cooperating and mentor teachers, to analyze school district mentoring and induction policies, and to build capacity for supporting novice and aspiring teachers. The Department intends to continue developing similar initiatives and working with higher education partners to find ways to incentivize and support the development of mentors and cooperating teachers.

19. **COMMENT:** The commenters expressed concern the 175 hours of clinical practice prior to full-time clinical practice proposed at N.J.A.C. 6A:9A-4.4(c)2 could lead to increased instructional, tuition, and transportation costs, and/or wage loss. (5, 6, 8, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40)

**RESPONSE:** The Department does not anticipate the proposed clinical practice requirements at N.J.A.C. 6A:9A-4.4(c)2 will lead to dramatic increases to instructional, tuition, and transportation costs or wage losses but will continue to study any economic impact. The commenters’ cost analysis assumes the 175 hours of clinical practice will be added to an existing educator preparation program. The Department does not encourage this practice but rather supports thoughtful consideration of program design to best utilize existing clinical hours, time, and resources to meet the new requirements. The Department has modeled its requirements after existing programs in New Jersey that already meet the increased bar. Therefore, the requirements are feasible to implement and, by themselves, do not lead directly to increased costs. The Department’s proposal also repeals the specific course requirements for educator preparation programs at current N.J.A.C. 6A:9A-3.2(a), which will allow for additional flexibility as providers consider program design.

20. **COMMENT:** The commenters recommended the Department study the impacts of extended clinical practice placements, which some colleges and universities in the State

currently implement for a portion of their candidates, on individual educator outcomes. The commenters further recommended results from the studies be shared with all educator preparation program providers. (5, 7, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31)

**RESPONSE:** The Department thanks the commenters for the recommendations and intends to continue to study, in collaboration with higher education partners, the impact of extended clinical experience and practice on the outcomes of educators and the students they serve. The Department intends to share findings with educator preparation program providers.

21. **COMMENT:** The commenter recommended the Department clarify “full-time” in N.J.A.C. 6A:9A-4.4(c), which requires a teacher candidate to complete 175 hours of clinical practice followed by one semester of full-time clinical practice. (10)

**RESPONSE:** The Department will not further clarify the meaning of “full-time” because it is a commonly understood term and educator preparation programs, which are the regulated organizations, have not expressed confusion or doubt as to its meaning.

22. **COMMENT:** The commenters expressed concern N.J.A.C. 6A:9A-4.4(d), which requires a clinical intern to be placed under the “direct and continuous personal supervision” of an appropriately certified cooperating teacher, will lead to greater responsibility by the cooperating teacher for the teacher candidate’s development. (5, 33, 34, 35, 36, 37, 38, 39, 40)

**RESPONSE:** The Department is not proposing to increase the responsibility of the cooperating teacher. “[D]irect and continuous personal supervision” appears in current N.J.A.C. 6A:9A-3.2(a)5, which requires a clinical intern be placed under the direct and continuous personal supervision of an appropriately certified cooperating teacher.

23. **COMMENT:** The commenter asked for the Department to clarify the level of supervision required of a cooperating teacher when supervising a clinical intern. (10)

**RESPONSE:** In response to feedback from school and school district representatives, the Department on June 3, 2015, provided clarity regarding the level of supervision required of a cooperating teacher when supervising a clinical intern. The Department amended proposed N.J.A.C. 6A:9A-4.4(d), which would have required a clinical intern be placed under the cooperating teacher’s “direct supervision,” to require the clinical intern to be placed under the cooperating teacher’s “direct and continuous personal supervision.”

24. **COMMENT:** The commenter asked the Department to clarify who in a school district is responsible for accepting and placing clinical interns as required by N.J.A.C. 6A:9A-4.4(e). (10)

**RESPONSE:** The intent of proposed N.J.A.C. 6A:9A-4.4(e) and current N.J.A.C. 6A:9A-3.2(a)5 is to signify that school districts have a shared responsibility for developing high-quality novice teachers and, therefore, school districts must accept and place clinical interns as part of the continuum of professional education and development. The school district has the discretion to determine who ultimately places the clinical intern in the classroom.

25. **COMMENT:** The commenter stated support for the Department’s proposals at N.J.A.C. 6A:9A-5.2(b) and 5.4(a)1, which will require CE educator preparation programs to accept

candidates in cohorts and to occur over at least two academic years. The commenter said the University of Pennsylvania's CE educator preparation program already meets both requirements. The commenter stated implementing a cohort model provides candidates more opportunities to engage with and learn from peers and requiring preparation to occur over two years allows for more purposeful guidance and thoughtful evaluation of a candidate's growth. (2)

**RESPONSE:** The Department thanks the commenter for the support and looks forward to working with the commenter to learn and share best practices.

26. **COMMENT:** The commenter stated doubling the pre-professional requirement at N.J.A.C. 6A:9A-5.3(a) from 24 to 50 hours for CE educator preparation program candidates could deter potential career and technical education (CTE) candidates from making the switch from industry to education. The commenter stated the deterrence could occur because candidates will have to take more time off of work for pre-service preparation and the improved economy will continue to provide competing opportunities for industry experts. Finally, the commenter stated the current certification requirements already are rigorous. (3)

**RESPONSE:** The Department disagrees the proposed pre-professional requirements will deter potential CTE candidates from making the switch from industry to education or will require candidates to take more time off of work because the Department, through the program approval process, will allow programs a great deal of flexibility regarding how they have candidates meet the pre-professional requirements. While the commenter stated the current pre-professional requirements are rigorous, they do not include a clinical component, which means a CE candidate is not required to be in front of students before becoming the teacher of record in charge of student learning. The Department disagrees with this practice and intends the proposed requirements to expose candidates to students before allowing candidates to become teachers of record in charge of student learning.

The Department proposes at N.J.A.C. 6A:9A-5.3(a)1 through 3 to require CE candidates to complete the following pre-professional requirements: 15 hours of coursework, 20 hours of clinical experiences, and 15 hours of coursework or clinical experience as determined by the program. Programs will have the flexibility to meet the pre-professional requirements by having candidates engage in activities and in a sequence that fits the needs of the program and its candidates. The Department will study any effect the proposed requirements may have on the supply of CTE and all other educators.

27. **COMMENT:** The commenter quoted the Bureau of Labor Statistics as projecting nine percent growth from 2012 to 2022 in the employment of CTE teachers. Due to increasing demand, the commenter recommended the Department provide flexibility for CTE candidates with regard to the proposed preparation requirements at N.J.A.C. 6A:9A-5 for CE educator preparation program candidates. (3)

**RESPONSE:** The Department already has proposed a great deal of flexibility with regard to how programs can meet the pre-professional and program requirements for CE educator preparation programs proposed at N.J.A.C. 6A:9A-5. The Department proposes at N.J.A.C. 6A:9-2.1 to allow for the first time for "formal instruction" to include in-classroom supports such as coaching. By expanding the definition of formal instruction, programs will have the flexibility to provide innovative and varied forms of instruction to candidates. At N.J.A.C. 6A:9A-5.4(a)1i, the Department also will allow a program to



waive up to 100 hours of instruction from a candidate's program of study. The flexibility options will be available to all programs.

- 28. COMMENT:** The commenter stated support for more flexible rules at N.J.A.C. 6A:9A-5.6 for the preparation of teacher candidates to serve in teacher shortage areas only if the flexible rules do not result in a lowering of the quality of teacher candidates or in an overreach of the State into school district practices. **(10)**

**RESPONSE:** The Department thanks the commenter for the support and has the same goal of providing flexibility for the training of teachers who serve in shortage areas while not lowering the quality of teacher candidates. In addition, the Department has not proposed any rule or amendment that would change the State's role with regard to teacher shortage areas.

#### **Summary of Agency-initiated Changes**

1. The Department proposes an amendment at proposed N.J.A.C. 6A:9A-5.6(e), which allows the CE educator preparation program approved to train candidates in teacher shortage areas to apply subject-specific coursework (i.e., biology, math, history) to the two main components of the program. Programs are required to provide a total of 400 hours, including 50 hours of pre-professional coursework/experience prior to when an educator starts teaching under provisional certification and 350 hours of formal instruction after an educator is teaching under provisional certification.

The Department recently determined proposed N.J.A.C. 6A:9A-5.6(e), as written, unduly burdens CE educator preparation programs approved to train educators in teacher shortage areas because the provision allows the subject-specific coursework to be applied to either the pre-professional coursework/experience "or" the formal instruction a candidate undergoes. The rule's intent was to perpetuate current practice, which is to allow the subject-specific coursework to apply to the pre-professional component, the formal instruction, or both. Therefore, the Department proposes to replace "or" with "and/or" to clarify all curriculum components of a program approved to train educators in teacher shortage areas may include subject-specific coursework.

Since the program's purpose is to reduce the shortage of teachers in mathematics, science, and other identified teacher shortage areas, the Department leaves to the program's discretion how the subject-specific curriculum work applies to the required CE preparation program hours. The flexibility ensures teachers are available to meet demand for qualified teachers in shortage areas and reduces the burden on individuals willing to teach in shortage areas. If the change is not made at adoption, the current provision would unnecessarily restrict the discretion of programs and, in turn, create unnecessarily burdensome requirements for qualified teachers in shortage areas.

- (e) Subject-specific coursework hours provided by a preparation program pursuant to this section may be applied to the minimum 50 hours of pre-professional and/or 350 formal instructional hours required pursuant to N.J.A.C. 6A:9A-5.4.**

*Note: The rule text provided above reflects the progression of the rule proposal. The rule text included in the Administrative Code portion of this document reflects the rule as it is being put forth at Adoption Level.*

*Document 2*

State of New Jersey  
DEPARTMENT OF EDUCATION  
PO Box 500

Adoption  
November 4, 2015

CHRIS CHRISTIE  
*Governor*

KIM GUADAGNO  
*Lt. Governor*

DAVID C. HESPE  
*Commissioner*

**TO:** Members, State Board of Education

**FROM:** David C. Hesper, Commissioner

**SUBJECT:** N.J.A.C. 6A:9A, New Jersey Educator Preparation Programs

**REASON FOR ACTION:** Readoption

**AUTHORITY:** N.J.S.A. 18A:1-1, 18A:4-15, 18A:6-34 and 38, and 18A:26-2.7 and 10; and P.L. 2012, c. 11.

**SUNSET DATE:** June 7, 2016

### Summary

In schools, teachers have the greatest influence on student learning. Within the educator lifecycle, no one factor in isolation will ensure all New Jersey students have access to a great teacher. Therefore, the Department of Education (Department) is committed to a holistic approach to attract, develop, and retain exceptional teachers. As the State employs higher criteria for instruction and holds educators accountable for meeting these criteria through improved student assessments and educator evaluation, the Department must ensure new teachers are prepared to meet the greater demands. Fostering high-quality preparation and maintaining a meaningful bar for entry into the profession are two key mechanisms for enhancing the effectiveness of novice teachers. The Department can leverage preparation and certification requirements to ensure strong candidates enter preparation programs, receive quality instruction, and demonstrate appropriate performance as novice teachers. The Department can also use candidate and programmatic data to provide more insight into New Jersey educator preparation programs and, ultimately, implement a better accountability system to ensure program quality across the State.

New Jersey is not alone in its goal to enhance the effectiveness of novice teachers. In late 2012, the Council of Chief State School Officers published *Our Responsibility, Our Promise: Transforming Educator Preparation and Entry into the Profession*, calling on states to increase licensure requirements and to utilize stronger program approval and accountability measures for educator preparation providers (Washington, D.C.: The Council of Chief State School Officers, 2012, 13-22, <http://www.ccsso.org/Documents/2012/OurResponsibilityOurPromise.pdf>). Teachers themselves are demanding greater rigor and enhanced preparation, as well. More than three out of five graduates of what are commonly called traditional educator preparation programs reported that

their program did not prepare them for “classroom realities” according to a study by Arthur Levine described in *Educating School Teachers* (Washington, D.C.: The Education Schools Project, 2006, 32, [http://www.edschools.org/teacher\\_report.htm](http://www.edschools.org/teacher_report.htm)). In addition, alternatively prepared candidates reported feeling less prepared and were less likely to rate their training high quality than traditionally prepared candidates, according to a study by Ayana Kee (*Journal of Teacher Education* 63(1), 23-38, <http://www.sagepub.com/journals>).

N.J.A.C. 6A:9 previously set forth the rules governing the preparation, licensure, and professional development of educators required by their positions to be certified. It also contained rules governing the approval of educator preparation programs and their content. Finally, it contained the rules delineating the organization of, power of, duties of, and proceedings before the State Board of Examiners. On August 4, 2014, the chapter was recodified into four chapters – N.J.A.C. 6A:9, 6A:9A, 6A:9B, and 6A:9C – via a notice of administrative changes (see 46 N.J.R. 1743(a)). Current N.J.A.C. 6A:9 pertains to professional standards for teachers and school leaders, while N.J.A.C. 6A:9A pertains to the rules governing educator preparation programs in New Jersey. N.J.A.C. 6A:9B focuses on the State Board of Examiners, its proceedings and the various types of certification. Lastly, N.J.A.C. 6A:9C contains the rules governing professional development for educators.

The Department proposes to readopt N.J.A.C. 6A:9A, New Jersey Educator Preparation Programs with amendments and new rules for preparation and certification to do the following: allow for more rigorous and extensive clinical experiences prior to student teaching/clinical practice; better align preparation standards for CEAS educator preparation programs, commonly called “traditional route,” and CE educator preparation programs, commonly called “alternate route”; provide greater flexibility with coursework inputs; increase monitoring of CEAS and CE educator preparation programs; require more robust clinical experiences; and provide more coherent program alignment between CEAS and CE educator preparation programs. The Department also proposes to differentiate between programs leading to a certificate of eligibility with advanced standing (CEAS), commonly called “traditional-route” programs, and programs candidates attend while employed under a certificate of eligibility (CE), commonly called “alternate-route” programs, as “CEAS educator preparation programs” and “CE educator preparation programs,” respectively.

Coupled with the recent recodification, the proposed reorganization of N.J.A.C. 6A:9A and the proposed amendments are meant to clarify educator preparation program requirements as compared to certification requirements in N.J.A.C. 6A:9B. The organizational changes are in response to concerns the current rules’ structure is confusing.

Finally, proposed amendments throughout N.J.A.C. 6A:9A reflect a significant shift in which comparable standards will be applied to both CEAS and CE educator preparation programs to address the problem that current regulations maintain significantly different standards for preparation for CE educator preparation programs compared to CEAS educator preparation programs.

The Department proposes throughout the chapter to replace “institutions of higher education” or “colleges and universities” with “CEAS educator preparation programs,” when appropriate, to align with shift in terminology used to differentiate between program types. The Department also proposes to replace “institutions of higher education” or “colleges and universities” with “higher education institutions” when referring to higher education systems within and outside the State, to replace “license” with “certificate” when describing an instructional, administrative, or educational services certificate, and to replace “student” with

“candidate” when referring to an aspiring teacher who has not yet received a teaching certificate. The proposed amendments will help maintain stylistic consistency.

The Department also proposes to replace “field experience” with “clinical component” when describing the clinical experience (commonly called “practicum”) and clinical practice (commonly called “student teaching”) in response to stakeholder feedback. The Department proposes in all subchapter and section headings, and throughout N.J.A.C. 6A:9A, to replace “clinical experience” with “clinical component,” “practicum” with “clinical experience,” “student teaching” with “clinical practice,” and “student teacher” with “clinical intern,” respectively. The proposed amendments will align with amendments to terms and definitions proposed in N.J.A.C. 6A:9 in a separate rulemaking.

Unless specified in this Summary, all amendments are proposed for clarity, stylistic, or grammatical improvement, or to update Administrative Code citations affected by proposed recodifications.

### Subchapter 1. Scope and Purpose

#### Proposed N.J.A.C. 6A:9A-1.1 Scope

The Department proposes this section to provide the chapter’s scope; the rules governing the approval of CEAS and CE educator preparation programs and their content, as well as the rules governing the preparation of educators and candidates that is required for certification.

#### Proposed N.J.A.C. 6A:9A-1.2 Purpose

The Department proposes this section to provide the chapter’s purpose, which is to establish a system of educator preparation programs that continuously serves to improve the quality of instruction for New Jersey’s children by functioning along a continuum of rigorous pre-professional preparation, certification, and professional development to prepare educators to support improved student achievement of the Core Curriculum Content Standards (CCCS).

### Subchapter 2. Definitions

#### N.J.A.C. 6A:9-2.1 Definitions

This section provides that the definitions at N.J.A.C. 6A:9-2.1 also apply to this chapter.

### Proposed Subchapter 3. Educator Preparation Program Approval

This subchapter sets forth the criteria for educator preparation programs and the process by which they gain Commissioner approval.

The Department proposes to amend, recodify, and reorganize this subchapter to describe the Department’s authority over and the approval process for CEAS and CE educator preparation programs. The reorganization will reflect the Department’s policy that CEAS and CE programs need to align with the same professional standards and undergo similarly rigorous approval and review processes even though the programs are different in structure. The Department also proposes a precise CE educator preparation program approval process because the existing process is not clearly described within the certification requirements in N.J.A.C. 6A:9B.

The Department proposes to **replace** the subchapter heading of “Standards for New Jersey Educator Preparation Programs in Higher Education” with “Educator Preparation Program Approval” to accurately reflect the subchapter’s proposed content.

**Proposed N.J.A.C. 6A:9A-3.1 Approval criteria of educator preparation programs**

This section describes the approval system for CEAS educator preparation programs, the scope of the Department’s authority to review them, and the criteria for program approval.

The Department proposes to **change** the section heading from “Requirements and standards for the approval of professional education programs preparing educational personnel” to “Approval criteria of educator preparation programs” to more accurately capture the section’s proposed content. The Department proposes in this section to describe the scope of the Department’s review of New Jersey CEAS and CE educator preparation programs leading to State certification and the Department’s criteria for approval.

The Department proposes to delete N.J.A.C. 6A:9A-3.1(a) and (a)1, which describe the three-tiered program approval process for CEAS educator preparation programs, including program approval committees.

The Department proposes to relocate N.J.A.C. 6A:9A-3.1(a)2 and 2i, which describe the composition of the State Program Approval Council (SPAC) and require the Council to advise the Commissioner on matters pertaining to higher education teacher, administrator, and educational service personnel preparation quality issues as N.J.A.C. 6A:9A-3.2(b). Proposed amendments are described in the Summary discussion of proposed N.J.A.C. 6A:9A-3.2.

The Department proposes to delete N.J.A.C. 6A:9A-3.1(a)2ii through iv, which require the SPAC to coordinate the peer review program approval process, to review program information for the periodic review of programs and to make recommendations to the Department regarding a program’s status and regarding program approval. The Department also proposes to delete N.J.A.C. 6A:9A-3.1(a)3, which requires the Department to take the appropriate action regarding program approval based on the SPAC’s recommendation. The provisions are proposed for deletion because N.J.A.C. 6A:9A-3.2 set forth an amended approval process that will apply to CEAS and CE educator preparation programs.

The Department proposes to recodify the first two sentences of N.J.A.C. 6A:9A-3.1(b), which explain the scope of program approval for all professional educator preparation programs leading to State certification in New Jersey higher education institutions, as N.J.A.C. 6A:9A-3.1(a). As proposed, the section will apply to program approval for all educator preparation programs.

The Department proposes to amend recodified N.J.A.C. 6A:9A-3.1(a) to replace “Department” with “Commissioner” to clarify the Commissioner will approve all programs. The Department also proposes to delete “professional” before “educator preparation programs” to align with updates to terminology. The Department also proposes to replace “in New Jersey institutions of higher education. The scope of program approval shall include” with “including;” and to add “and educator preparation programs established by educational organizations, school districts, or consortia, or Commissioner-approved entities” as examples of programs the Commissioner will approve. The subchapter, as proposed, will apply to programs at higher education institutions and other Commissioner-approved educator preparation programs not affiliated with a college or university.

The Department proposes to delete the compliance requirement at N.J.A.C. 6A:9A-3.1(b)2 that programs comply with State content-specific professional standards by licensure area as such State standards do not exist.

The Department proposes to delete N.J.A.C. 6A:9A-3.1(b)3 and 4, which respectively describe the documentation required for initial review and approval of all new or substantially revised programs and the documentation required to be reviewed by the SPAC and for the periodic review and approval for continuation of all preparation programs. The Department proposes to delete N.J.A.C. 6A:9A-3.1(b)3, which lists the required documents for program approvals, as approval will be based on meeting the minimum criteria set forth in the chapter rather than the submission of specific documentation. The Department proposes to delete N.J.A.C. 6A:9A-3.1(b)4 because proposed N.J.A.C. 6A:9A-3.2(c) will require programs to submit data for the Commissioner's periodic review and approval of the continuation of CEAS and CE educator preparation programs.

The Department proposes new N.J.A.C. 6A:9A-3.1(b)2 to embody current N.J.A.C. 6A:9A-3.1(b)5, which requires CEAS educator preparation programs to be accredited by a national accrediting body recognized by the Council on Higher Education Accreditation (CHEA) and approved by the Commissioner, and N.J.A.C. 6A:9A-3.1(c)3, which require accreditation through the National Council for Accreditation of Teacher Education (NCATE), the Teacher Education Accreditation Council (TEAC), or a body recognized by CHEA and approved by the Commissioner. The Department proposes N.J.A.C. 6A:9A-3.1(b)2i to require CEAS educator preparation programs to be accredited through NCATE, the TEAC, the Council for the Accreditation of Educator Preparation (CAEP), or any other professional education accreditation body recognized by the CHEA or approved by the Commissioner. The proposed subparagraph reflects the current educator preparation accreditation requirements for CEAS educator preparation programs leading to instructional, administrative, or educational services certification. The Department proposes to add the CAEP as a recognized accrediting body to reflect the recent merger of NCATE and TEAC. The Department also proposes to allow accrediting bodies to be recognized by CHEA "or" approved by the Commissioner. The Department does not want to unintentionally limit the types of entities that can accredit by requiring the accrediting body be recognized by CHEA, due to the changing nature of accreditation and the new requirement for CE educator preparation programs to secure accreditation proposed at N.J.A.C. 6A:9A-3.1(b)2ii.

The Department proposes N.J.A.C. 6A:9A-3.1(b)2ii to require CE educator preparation programs designed to lead to instructional certification to become accredited by January 1, 2022, to ensure all educator preparation programs are held to equitable standards. CE educator preparation programs will be required to become accredited five years after the proposed amendments take effect (amendments are proposed to take effect for 2017-2018 academic year). The proposed timeline aligns with the five-year timeline provided to CEAS educator preparation programs when the State Board, in January 2004, adopted rules requiring CEAS educator preparation programs to become accredited (36 N.J.R. 469(a)).

The Department proposes N.J.A.C. 6A:9A-3.1(b)3 to embody N.J.A.C. 6A:9A-3.1(b)6, which requires programs to be in compliance with accreditation rules. The Department proposes N.J.A.C. 6A:9A-3.1(b)3 to require educator preparation program approval to be based on compliance with all educator preparation requirements in this chapter or in N.J.A.C. 6A:9B, as applicable. N.J.A.C. 6A:9B contains the program requirements for educator preparation programs leading to administrative and educational services certificates. The Department intends through the proposed amendment to describe current practice, which is for all educator preparation programs leading to instructional, administrative, or educational services certificates to be

approved by the Commissioner, and not to alter the approval criteria for educator preparation programs leading to administrative or educational services certificates.

The Department proposes new N.J.A.C. 6A:9A-3.1(b)4 to require educator preparation program approval to be based on performance, as indicated by the required documentation pursuant to N.J.A.C. 6A:9A-3.2(f), for operating programs because the Commissioner will consider during program approval the performance of operating programs.

The Department proposes to relocate N.J.A.C. 6A:9A-3.1(c)1 and 2, which sets forth the program approval and periodic review process, to N.J.A.C. 6A:9A-3.2(c) and (d), respectively. Proposed amendments are described in the Summary discussion of proposed N.J.A.C. 6A:9A-3.2.

The Department also proposes to delete N.J.A.C. 6A:9A-3.1(c)3, which requires programs to obtain accreditation through NCATE, TEAC, or any other national professional education accreditation body recognized by CHEA and the Commissioner, because the rules regarding accreditation appear in proposed N.J.A.C. 6A:9A-3.1(b)2i. The Department also proposes to delete N.J.A.C. 6A:9A-3.1(c)3i, which requires higher education institutions preparing professional educators that fail to obtain national accreditation to forfeit State approval to offer professional educator preparation programs leading to certification. The provision is obsolete since all institutions of higher education preparing professional educators in New Jersey have obtained national accreditation.

The Department proposes to relocate current N.J.A.C. 6A:9A-3.1(c)3ii, which explains the State will withdraw approval for any institution of higher education preparing professional educators that fails to meet the conditions in current N.J.A.C. 6A:9A-3.1(c)3i, as new N.J.A.C. 6A:9A-3.2(e). Proposed amendments are described in the Summary discussion of proposed N.J.A.C. 6A:9A-3.2.

The Department proposes to relocate N.J.A.C. 6A:9A-3.1(d) and (d)1 as N.J.A.C. 6A:9A-4.3(a) and (b), and N.J.A.C. 6A:9A-3.1(d)2 as N.J.A.C. 6A:9A-4.3(d). Proposed amendments are described in the Summary discussion of proposed N.J.A.C. 6A:9A-4.3.

The Department proposes to delete the elementary or secondary school practicum requirement at N.J.A.C. 6A:9A-3.1(d)3 because the Department will require candidates to meet more rigorous clinical experience requirements prior to clinical practice in proposed N.J.A.C. 6A:9A-4.4(a)2.

The Department also proposes to delete N.J.A.C. 6A:9A-3.1(e) and (e)1, which require college or university faculty to evaluate each student at the end of the semester prior to student teaching and to base the evaluation on the candidate meeting a minimum 3.00 GPA. The Department has eliminated the requirement that candidates achieve a 3.00 GPA prior to clinical practice. Effective July 7, 2014, the GPA required for entry into an educator preparation program and for a CEAS was raised to 3.00 from 2.50 and 2.75, respectively. The current standards are sufficient as candidates automatically have to maintain a GPA near 3.00 to complete the preparation program and earn a CEAS. The Department proposes to relocate and amend N.J.A.C. 6A:9A-3.1(e)2, which requires faculty evaluations of students to be based on acceptable levels of teaching proficiency in junior field experience and the evaluations to be communicated to the student and kept in her or her permanent file, to N.J.A.C. 6A:9A-4.4(a)1i.

The Department proposes to relocate N.J.A.C. 6A:9A-3.1(f), which requires colleges and universities to assure only students meeting the requirements in N.J.A.C. 6A:9A-3.1(d) are assigned to student teaching, as N.J.A.C. 6A:9A-4.4(a) because clinical practice requirements will



be located in proposed N.J.A.C. 6A:9A-4.4. Proposed amendments are described in the Summary discussion of proposed N.J.A.C. 6A:9A-4.4.

The Department proposes to relocate the following: N.J.A.C. 6A:9A-3.1(g), which describes the criteria a student must meet before a CEAS educator preparation program can recommend him or her for certification, to N.J.A.C. 6A:9A-4.5(a); N.J.A.C. 6A:9A-3.1(h), which requires teacher preparation programs to submit program-level data to the Department upon request, to N.J.A.C. 6A:9A-4.1(b)6; N.J.A.C. 6A:9A-3.1(i), which requires equal treatment of all students, to N.J.A.C. 6A:9A-4.1(a)1; N.J.A.C. 6A:9A-3.1(j), which requires programs to set up procedures for placing on probation and dismissing students who fail to meet the chapter's requirements, to N.J.A.C. 6A:9A-4.1(b)4; N.J.A.C. 6A:9A-3.1(k), which requires colleges and universities to recommend issuance of a CEAS for each qualifying candidate, to N.J.A.C. 6A:9A-4.5(a); and N.J.A.C. 6A:9A-3.1(l), which mandates that a college or university report to the Department when a student has successfully completed a program, to N.J.A.C. 6A:9A-4.5(b).

The Department proposes to delete N.J.A.C. 6A:9A-3.1(m), which requires colleges and universities to align their programs with the Professional Standards for Teachers, because alignment is required for all programs under proposed N.J.A.C. 6A:9A-3.1 and is repeated in the curriculum requirements at proposed N.J.A.C. 6A:9A-4.2(a)2.

The Department also proposes to delete N.J.A.C. 6A:9A-3.1(n) and (o), which reference a shift in program completion requirements for students matriculating after 2004, because the Department proposes in a separate rulemaking to relocate to N.J.A.C. 6A:9B all subject specific requirements that apply only to certain endorsements.

The Department also proposes to relocate N.J.A.C. 6A:9A-3.1(p), which states that all proficiency requirements for program admission, clinical practice, and recommendation for certification are minimum requirements, as N.J.A.C. 6A:9A-4.1(a)2.

The Department proposes new N.J.A.C. 6A:9A-3.1(c) to allow the Commissioner to consider data and performance evidence from a program provider's operating educator preparation program(s) before approving a new program by the same program provider. The new subsection will allow the Commissioner to consider available provider's performance evidence before approving an entirely new program under the same program provider.

#### **Proposed N.J.A.C. 6A:9A-3.2 Approval process for educator preparation programs**

The Department proposes new N.J.A.C. 6A:9A-3.2, Approval process for educator preparation programs. The new section reflects the Department's proposal to separate the approval process from required program approval criteria, which currently are in N.J.A.C. 6A:9A-3.1. N.J.A.C. 6A:9A-3.1 describes a three-tiered system of program approval, including program approval committees, a SPAC, and final approval through the Department. The proposed approval process will be more streamlined as it maintains the Commissioner's authority over final approval and the SPAC, but eliminates the more prescriptive process and SPAC requirements. Instead of requiring program approval committees, the Department will ensure content experts from the Department and SPAC review applications within the Commissioner's review and consultation with the SPAC. The revised review process will eliminate an overly burdensome third approval step but will include content-specific review.

The Department proposes N.J.A.C. 6A:9A-3.2(a) to state the Commissioner has the authority and discretion to approve all new or substantially revised educator preparation programs and must consider the SPAC's analysis of the proposed program and recommendation for

approval. The proposed subsection will clarify the SPAC will be responsible for providing not only a recommendation of whether the program should be approved, but also an analysis of the program's strengths and weaknesses.

The Department proposes to relocate and amend N.J.A.C. 6A:9A-3.1(a)2 and 2i, as new N.J.A.C. 6A:9A-3.2(b). N.J.A.C. 6A:9A-3.1(a)2 states the Commissioner must appoint an SPAC comprised of 11 members, including six higher education representatives and five preschool through grade 12 practitioners. N.J.A.C. 6A:9A-3.1(a)2i requires the SPAC to advise the Commissioner on matters pertaining to higher education teacher administrator, and educational service personnel preparation quality issues. The Department proposes new N.J.A.C. 6A:9A-3.2(b) to require the Commissioner to appoint the SPAC and consult with it regarding the same matters. The Department also proposes to add citations for rules regarding teacher, administrator, and educational services certificates to clarify the types of educator preparation programs for which the Commissioner will consult the SPAC. Additionally, the Department proposes to eliminate "higher education" from the matters on which the SPAC advises the Commissioner because the SPAC will now analyze and recommend for approval both CEAS and CE educator preparation programs. Therefore, SPAC's composition must also include representatives from CE educator preparation programs. The Department proposes N.J.A.C. 6A:9B-3.2(b)1 through 3 to specify the SPAC composition as follows: four representatives from CEAS educator preparation programs, three representatives from CE educator preparation programs, and four practitioners from preschool through grade 12 schools. The Department also proposes at N.J.A.C. 6A:9A-3.2(b) to establish two-year, renewable terms for SPAC members. The proposed term limit will allow CE educator preparation programs to be represented on the SPAC as other members' terms expire.

The Department proposes to relocate and amend N.J.A.C. 6A:9A-3.1(c)1, which requires a new or substantially revised educator preparation program to secure initial approval prior to implementation, as N.J.A.C. 6A:9A-3.2(c). The Department proposes to delete "initial" before "approval" because it is unnecessary. The Department proposes new N.J.A.C. 6A:9A-3.2(c)1 to prescribe that an educator preparation program will be considered substantially revised if changes are made to the program's course content or requirements, or clinical component structure or requirements. The Department has been informed by program officials that current rule do not clearly specify when a program is considered substantially revised.

The Department proposes to relocate N.J.A.C. 6A:9A-3.1(c)2, which requires programs at higher education institutions that prepare educators to be reviewed at least once every seven years at least six months prior to the higher education institution's national accreditation process, as N.J.A.C. 6A:9A-3.2(d). The Department proposes to amend the provision to read: "The Commissioner shall re-approve all educator preparation programs at least every seven years and has the authority and discretion to periodically review and re-approve educator preparation programs more frequently at his or her discretion." The elimination of the requirement to conduct the review six months prior to national accreditation aligns with the goal of approving and reviewing CE educator preparation programs, which will not be required to be accredited until 2022. The proposed amendments also will clarify it is the Commissioner who leads the review and ultimately reapproves programs. Finally, the subsection as proposed will allow for better oversight of programs as it gives the Commissioner the necessary authority to conduct more frequent reviews of programs that may be out of compliance or struggling to provide quality service to teacher candidates.

As previously explained, the Department proposes to relocate N.J.A.C. 6A:9A-3.1(c)3ii as N.J.A.C. 6A:9A-3.2(e). The Department also proposes to replace "State" with "Commissioner" for consistency throughout the subchapter and to replace "institution of higher education preparing professional educators" with "educator preparation program" because the subchapter now applies

to both CEAS and CE educator preparation programs. The Department proposes an amendment to allow the Commissioner to “require the educator preparation program to take corrective action” if he or she determines a program is not in compliance or is at risk of failing to meet the criteria set forth in N.J.A.C. 6A:9A-3.1(b). Current rules only allow the Commissioner to withdraw approval and do not allow for remedial or corrective action. Finally, the Department proposes at new N.J.A.C. 6A:9A-3.2(e) to replace “that fails to meet the conditions in (c)3i above” with “has failed, or is at risk of failing, to meet the criteria in N.J.A.C. 6A:9A-3.1(b)” to allow the Commissioner to take corrective action if a program is at risk of failing to meet the approval criteria in this section.

The Department proposes to relocate and amend N.J.A.C. 6A:9A-3.1(b)4, which set forth documentation that may be reviewed by the SPAC for periodic review for all preparation programs in conjunction with national accreditation, as N.J.A.C. 6A:9A-3.2(f). The Department proposes to replace the SPAC with the Commissioner as the party leading the periodic review process, but maintains that the Commissioner, pursuant to N.J.A.C. 6A:9A-3.2(b), will consult with SPAC. The Department also proposes to relocate and amend N.J.A.C. 6A:9A-3.1(b)4i through vii as N.J.A.C. 6A:9A-3.2(f)1 through 7 to provide a non-exhaustive list of documentation the Commissioner will use for his or her periodic review and approval of the continuation of programs. The documentation will include, but is not limited to, the following: candidate performance assessment scores and pass rates; numbers of educator candidates prepared in teacher shortage areas and from diverse backgrounds; placement and retention rates; evaluation data based on initial year(s) of teaching; scores and pass rates on State test(s) of subject matter knowledge and a Commissioner-approved test of basic skills; follow-up survey of graduates and employers; and preschool through grade 12 student achievement data, when relevant. The proposed subsection reflects the Department’s policy that data needs to be collected from all Commissioner-approved educator preparation programs to most effectively monitor approved programs and to facilitate the lawful sharing of data with teacher candidates who are considering which program to attend.

#### **Proposed Subchapter 4. CEAS Educator Preparation Programs**

The Department proposes the subchapter to separate the minimum program procedure and component requirements for CEAS educator preparation programs from the requirements for CE educator preparation programs.

#### **Proposed N.J.A.C. 6A:9A-4.1 CEAS educator preparation program implementation**

The Department proposes the section to provide an overview of the requirements, procedures, and components of CEAS educator preparation programs to ensure specific procedures and components are met prior to program approval.

The Department proposes N.J.A.C. 6A:9A-4.1(a) to require CEAS educator preparation programs to implement the subchapter’s program requirements.

The Department proposes to relocate N.J.A.C. 6A:9A-3.1(f), which ensures program requirements for CEAS educator preparation programs are applied equitably and in a non-discriminatory manner to all students, including transfers, as N.J.A.C. 6A:9A-4.1(a)l. The paragraph also requires all admissions and retention processes to be consistent with State and institutional affirmative action policies and goals.

The Department also proposes to relocate N.J.A.C. 6A:9A-3.1(p), which states the program requirements at N.J.A.C. 6A:9A-3.1(d) through (g) are minimum requirements and allows colleges and universities to exceed GPA and proficiency requirements for program admission, clinical component, and recommendation for certification, as N.J.A.C. 6A:9A-4.1(a)2.

The Department proposes N.J.A.C. 6A:9A-4.1(b) and (b)l through 3 and 5 to require CEAS educator preparation programs to develop program procedures and components that include the following: course requirements; formal admission to the program; clinical component and clinical practice supervision and recommendation of a candidate for a CEAS. The Department proposes to relocate N.J.A.C. 6A:9A-3.1(j), which requires colleges and universities to have procedures for placing students on probation or dismissing them from the program if they fall below minimum requirements and to incorporate appeal procedures, as N.J.A.C. 6A:9A-4.1(b)4. The Department proposes to relocate N.J.A.C. 6A:9A-3.1(h), which requires preparation programs to submit program-level data at the Department's request, as N.J.A.C. 6A:9A-4.1(b)6.

**Proposed N.J.A.C. 6A:9A-4.2 CEAS educator preparation program course requirements (Current N.J.A.C. 6A:9A-3.2)**

The Department proposes to recodify N.J.A.C. 6A:9A-3.2, which describes the curricular requirements for CEAS educator preparation programs, as N.J.A.C. 6A:9A-4.2 and to change the heading from "Curriculum for teacher preparation programs" to "CEAS educator preparation program course requirements."

The Department proposes at recodified N.J.A.C. 6A:9A-4.2(a) to include the introductory phrase, "The CEAS educator preparation program designed to lead to instructional certification shall include:," and proposes to delete the reference to candidates seeking the preschool through grade three and special education endorsements as all subject-specific requirements will be included under certification endorsement sections in N.J.A.C. 6A:9B-9 through 11.

The Department proposes to delete N.J.A.C. 6A:9A-3.2(a)1, which requires candidates in all CEAS educator preparation programs to complete a minimum of 60 semester credit hours of general education. Candidates are already required, pursuant to the higher education rule at N.J.A.C. 9A:1-2.4, to complete approximately 60 semester credit hours of general education to earn a degree. Since obtaining the required credit hours occurs outside of the educator preparation program, the requirement is not necessary at N.J.A.C. 6A:9A-3.2.

The Department proposes to delete N.J.A.C. 6A:9A-3.2(a)2, which requires candidates in CEAS educator preparation programs to complete a major in the arts, humanities, social sciences, mathematics, science, or technology disciplines, because a major or 30 credits is a certification endorsement requirement included at proposed N.J.A.C. 6A:9B-9. Therefore, it is redundant to include the requirement in the section on general higher education and certification requirements.

The Department proposes to delete N.J.A.C. 6A:9A-3.2(a)3, which requires candidates in CEAS educator preparation programs to complete a minimum of 90 credits of the total program distributed among general education and the academic major. As long as all necessary minimum requirements for the completion of educator preparation program, degree, and certification are met, a set distribution of credits is not warranted.

The Department also proposes to recodify N.J.A.C. 6A:9A-3.2(a)4, which requires CEAS educator preparation programs to adhere to a curriculum that includes specific topics, as N.J.A.C. 6A:9A-4.2(a)l and to amend the paragraph. The Department proposes in the first sentence to replace "[a] sequence of courses devoted to professional preparation" with "[a] curriculum devoted to educator preparation that builds upon the content knowledge and skills of the individual candidate" to specify the curriculum must be connected to each candidate's content knowledge and skills. The Department proposes to delete the specific list of courses, including behavioral/social sciences, the teaching of literacy and numeracy, educating linguistically diverse

and special education students, and integrating educational technology and tools into the curriculum and classroom to provide flexibility to CEAS educator preparation programs. The Department maintains the importance of such topics, but specifically listing course topics in this section is unnecessary because they already are listed in the State's Professional Standards for Teachers.

The Department proposes to relocate the first half of the fourth sentence of N.J.A.C. 6A:9A-3.2(a)4, which requires the professional component of teacher preparation to be aligned to the State's Professional Standards for Teachers, to N.J.A.C. 6A:9A-4.2(a)2 and to amend it to replace "professional component" with "clinical component" and to delete "undergraduate" as the section, as proposed, applies to undergraduate and graduate educator preparation programs.

The Department proposes to delete the second half of the fourth sentence of N.J.A.C. 6A:9A-3.2(a)4: the professional component "shall provide students, normally beginning in the sophomore year, with practical experiences in an elementary, middle or secondary school setting." Instead, the Department proposes new N.J.A.C. 6A:9A-4.2(a)3 to require clinical experiences to be incorporated into courses leading up to and including clinical practice to reflect current practice and to provide programs the flexibility to embed practical experiences into relevant coursework throughout the program prior to clinical practice. While proposed N.J.A.C. 6A:9A-4.2(a)3 embodies the requirement for practical experience in current N.J.A.C. 6A:9A-3.2(a)4, the Department proposes it as a new paragraph since the sentence is so substantially revised.

The Department also proposes to delete N.J.A.C. 6A:9A-3.2(a)5, which describe requirements for clinical practice, its equivalent Master of Arts in Teaching (MAT) program, and clinical intern supervision. The Department proposes significant changes to the clinical practice requirements in proposed N.J.A.C. 6A:9A-4.4 and proposes to relocate and amend the MAT requirements to proposed N.J.A.C. 6A:9A-4.6, which describes all post-baccalaureate and graduate-level program requirements.

The Department proposes to delete N.J.A.C. 6A:9A-3.2(b) through (f), which respectively describe subject-specific curriculum requirements for the following endorsements: the Preschool through Grade 3; Students with Disabilities; Deaf or Hard of Hearing with Oral/Aural Communication; Blind or Visually Impaired; and Deaf or Hard of Hearing.

The Department also proposes to delete N.J.A.C. 6A:9A-3.2(g), which contains rules for colleges/universities to develop dual certification programs. The Department proposes in a separate rulemaking to compile endorsement rules, including required courses and curriculum for each subject or type of endorsement, in N.J.A.C. 6A:9B, State Board of Examiners and Certification.

#### Proposed N.J.A.C. 6A:9A-4.3 Admission to CEAS educator preparation programs

The Department proposes N.J.A.C. 6A:9A-4.3 to provide an overview of the admission requirements for CEAS educator preparation programs and distinguish their admission requirements from those of CE educator preparation programs.

The Department proposes to relocate and amend N.J.A.C. 6A:9A-3.1(d) and (d)1, which require teacher preparation programs to admit at the beginning of the junior year only candidates who meet minimum GPA requirements, as N.J.A.C. 6A:9A-4.3(a) and (b). The Department heard from members of the higher education community the language in N.J.A.C. 6A:9A-3.1(d) and (d)1 is unclear. CEAS educator preparation programs typically accept candidates in the spring prior to the start of a fall program; therefore, "Formal admission" and "at the beginning of junior year" in

N.J.A.C. 6A:9A-3.1(d) and “September 1, 2015,” in N.J.A.C. 6A:9A-3.1(d)1 seem to contradict each other. To clear up any confusion, the Department proposes N.J.A.C. 6A:9A-4.3(a) as: “A candidate who starts a CEAS educator preparation program in or after academic year 2015-2016 shall be admitted only if he or she meets the GPA and basic skills requirement in (b) and (d) below.” The proposed language will clarify when the cumulative GPA requirement goes into effect relative to program start dates. The proposed amendment also will eliminate the unnecessary timing requirement and will provide flexibility to educator preparation programs.

The Department proposes N.J.A.C. 6A:9A-4.3(b) to reorganize, but not substantively amend, the GPA requirements in current N.J.A.C. 6A:9A-3.1(d)1. The proposed subsection will require the accepted cohort of candidates who start a CEAS educator preparation program in academic year 2015-2016, or thereafter to have an average cumulative GPA of at least 3.00. The Department also proposes N.J.A.C. 6A:9A-4.3(b)1 to require each accepted individual candidate to achieve at least a 2.75 GPA, while proposed N.J.A.C. 6A:9A-4.3(b)2 will require a candidate admitted to a program that starts in an academic year prior to 2015-2016 to maintain for the first two years of college an individual cumulative GPA of at least 2.50.

The Department proposes N.J.A.C. 6A:9A-4.4(c) to require a candidate entering a post-baccalaureate or graduate-degree program to hold a bachelor’s degree from a regionally accredited college or university and to allow candidates enrolled in a combined bachelor’s and graduate-degree program to pursue a bachelor’s degree from a regionally accredited college or university while enrolled in the program. The proposed subsection reflects current practice and ensures candidates entering post-baccalaureate, five-year MAT, or other graduate degree programs have earned or are earning a bachelor’s degree from a regionally accredited college or university.

The Department proposes to relocate and amend N.J.A.C. 6A:9A-3.1(d)2, which requires a minimum score on the Commissioner-approved basic skills assessment, as N.J.A.C. 6A:9A-4.3(d). The Department also proposes to delete the second sentence of N.J.A.C. 6A:9A-3.1(d)2: “Students with deficiencies in these areas upon admission to college shall be required to demonstrate proficiency through an oral or written assessment by the beginning of the junior year.” The provision is unnecessary as proposed N.J.A.C. 6A:9A-4.3(d) requires all candidates to demonstrate proficiency prior to entering the educator preparation program. The Department proposes N.J.A.C. 6A:9A-4.3(d)1 to allow programs to determine how candidates who enter programs prior to academic year 2015-2016 demonstrate basic skills proficiency to codify current practice. The Department proposes at N.J.A.C. 6A:9A-4.3(d)2, which exempts a candidate from the requirement to pass a basic skills assessment if he or she achieves at or above a minimum score on one of three tests (1660 on the SAT, 23 on the ACT, or 310 on the GRE with a 4.0 writing score), to replace “[a]s of September 1, 2015” with “starts a program in or after academic year 2015-2016” to clarify the paragraph applies to candidates entering a program for the 2015-2016 academic year and not only to candidates entering after September 1, 2015. The Department also proposes to delete the specific cut-off scores. According to the Summary of a previous rulemaking (45 N.J.R. 2072(a)), the specific scores adopted were meant to represent the top-third percentile scores for the GRE, SAT, and ACT. The Department proposes instead to allow candidates to meet the basic skills requirement by achieving a minimum score established by the Commissioner on the SAT, ACT, or GRE.

The Department proposes N.J.A.C. 6A:9A-4.3(d)2i to require the Department to maintain on its website a list of qualifying minimum scores for each test, which will be approximately equal to the top-third percentile score for all test takers in the year the respective test was taken, for each year the data is available. By posting the scores, the Department will be able to communicate the accurate top-third percentile score for each test for each year.

The Department adopted the cut-off scores on July 7, 2014. At the time, the Department wrote the use of cut-off scores was “more fair for candidates because it creates a clear, unmoving target” (46 N.J.R. 164(a)). However, developments in the testing industry indicate the current cut-off scores are or will be inaccurate. The College Board, designers of the SAT, announced on March 5, 2015, it is redesigning the SAT as well as changing the scoring from 2400 to 1600 with an optional writing section. When the redesigned SAT is administered for the first time in spring 2016, the score of 1660 no longer will represent the top-third percentile score. Based on this development and potentially similar changes for the other assessments, asking candidates to score in the top-third percentile is a more consistent rule because changes to tests and scoring methodology cannot be predicted. Further, at the time of adopting the cut-off scores, the Department indicated the top-third percentile scores “may be difficult for candidates to access on an annual basis” (46 N.J.R. 164(a)). The Department proposes remove this difficulty by posting on its website the cut-off score for each test for each year.

The Department proposes N.J.A.C. 6A:9A-4.3(d)2ii to allow a candidate to be exempt from passing a basic skills assessment only if he or she achieved at least the minimum qualifying score on the SAT, ACT or GRE, which will be posted on the Department’s website.

**Proposed N.J.A.C. 6A:9A-4.4 Clinical component and candidate supervision for CEAS educator preparation programs (Current N.J.A.C. 6A:9A-3.3)**

The Department proposes to recodify N.J.A.C. 9A:9A-3.3 as N.J.A.C. 6A:9A-4.4, and to change the heading from “Supervision of practicum students” to “Clinical component and candidate supervision for CEAS educator preparation programs.”

The Department proposes to relocate and amend N.J.A.C. 6A:9A-3.1(f), which requires candidates meet minimum requirements prior to being assigned to clinical practice, as N.J.A.C. 6A:9A-4.4(a). Proposed N.J.A.C. 6A:9A-4.4(a)1 and 2 will strengthen existing clinical experience requirements at current N.J.A.C. 6A:9A-3.2(a)4, which requires programs to provide practical experiences in an elementary, middle, or secondary school setting, by requiring a minimum of 50 hours of clinical experience to take place in multiple classroom settings, including placement in a classroom with special education students prior to clinical practice. Strengthening current regulations will provide candidates experience with diverse learners prior to leading a classroom during clinical practice.

The Department proposes N.J.A.C. 6A:9A-4.4(a)1 to require all students starting clinical practice in academic year 2018-2019, or thereafter, to complete at least 50 hours of clinical experiences in a preschool, elementary, middle, and/or secondary school setting prior to clinical practice. The Department proposes to recodify and amend N.J.A.C. 6A:9A-3.1(e)2 as N.J.A.C. 6A:9A-4.4(a)1i to provide preparation programs the discretion to determine how students demonstrate acceptable levels of teaching proficiency in junior clinical experiences for candidates in preparation programs who start clinical practice prior to academic year 2018-2019.

The Department proposes N.J.A.C. 6A:9A-4.4(a)2i and ii to establish specific clinical experience requirements to occur prior to clinical practice. The requirements may be incorporated into any higher education course(s) and must include at least two classroom settings, with at least one in a special education setting to ensure candidates receive exposure to multiple classroom settings prior to beginning the clinical practice year.

The Department proposes to relocate and amend the last sentence N.J.A.C. 6A:9A-3.2(a)4, which requires the clinical experiences to increase in intensity and duration through the program.

as N.J.A.C. 6A:9A-4.4(a)2iii. The Department proposes to delete “culminating with a student teaching experience” because clinical practice will be required at N.J.A.C. 6A:9A-4.4(b).

The Department proposes N.J.A.C. 6A:9A-4.4(b) to encompass the provision in the third sentence of N.J.A.C. 6A:9A-3.2(a)5, which requires clinical practice to be a full-time experience of one semester’s duration and must be included within the professional component. Proposed N.J.A.C. 6A:9A-4.4(b) will require clinical practice to be one semester for students who start it before academic year 2018-2019. The Department also proposes to delete “included within the professional component” because the Department is dividing the professional component into clinical experience and clinical practice. Strengthening clinical practice requirements ensures candidates will engage in more opportunities to learn from their cooperating teacher and slowly take control of a classroom in the certification area sought.

The Department proposes N.J.A.C. 6A:9A-4.4(c) and (c)1 to require students who start clinical practice in academic year 2018-2019, or thereafter, to complete two consecutive semesters of clinical practice within a placement school, including the school district’s professional development days prior to the first day of class for students. The Department proposes N.J.A.C. 6A:9A-4.4(c)2 to require students who start clinical practice in academic year 2018-2019, or thereafter, to complete their clinical practice at the same school site for the entire experience, if possible. Proposed N.J.A.C. 6A:9A-4.4(c)2 also will require the clinical practice to include at least 175 hours to occur throughout the first semester and progress to full-time by the beginning of the second semester. The proposed requirements will ensure candidates are, when possible, working with the same students for two consecutive semesters and engaging in opportunities to measure student growth with the cooperating teacher.

The Department proposes to relocate the fourth sentence of N.J.A.C. 6A:9A-3.2(a)5, which requires candidates to be under the direct and continuous personal supervision of an appropriately certified cooperating teacher, as N.J.A.C. 6A:9A-4.4(d). The Department also proposes to add a requirement for clinical practice placement to occur within the endorsement subject sought by the candidate for certification to reflect current practice.

The Department proposes to relocate the second sentence in N.J.A.C. 6A:9A-3.2(a)5, which requires school districts to be responsible for accepting and placing clinical interns as part of the continuum of professional education and development, as N.J.A.C. 6A:9A-4.4(e).

The Department proposes to recodify N.J.A.C. 6A:9A-3.3(a), which requires collegiate faculty supervising students to have had experience supervising, consulting, or otherwise working in a classroom for the previous two years and be full-time faculty or be part-time faculty with demonstrated expertise in their field. N.J.A.C. 6A:9A-4.4(f). The Department also proposes to recodify N.J.A.C. 6A:9A-4.4(f) to replace “[c]ollegiate faculty assigned to supervise students” with “[a] clinical supervisor.” The Department proposes to recodify N.J.A.C. 6A:9A-4.4(f)2 to replace “full-time faculty members or part-time faculty” with “employed by the program or university.” The proposed amendments will provide programs flexibility when hiring faculty members and align with amendments to terms and their definitions proposed in N.J.A.C. 6A:9-2.1 in a separate rulemaking. Recodified N.J.A.C. 6A:9A-4.4(f)1 will retain the requirement for a preschool program supervisor to have experience supervising, consulting, or otherwise working in an early childhood setting.

The Department proposes to recodify N.J.A.C. 6A:9A-3.3(b), which describes the supervisory loads of collegiate faculty, as N.J.A.C. 6A:9A-4.4(g) and to replace “[c]ollegiate supervisors of student teacher” with “[c]linical supervisors.” The Department also proposes to amend recodified N.J.A.C. 6A:9A-4.4(g) by removing the requirement that supervisors are



assigned “supervisory loads that permit observation of each student” because it is unnecessary. The rule establishes a minimum number of observations per clinical intern, and it is the educator preparation program’s responsibility to assign to a supervisor an appropriate number of clinical interns to allow the supervisor to conduct observations in compliance with the rule. The Department proposes to maintain current practice and require all clinical supervisors to observe each assigned candidate at least once every other week during a candidate’s semester of full-time clinical practice. The proposed amendments will clarify the requirement and will provide program flexibility in employee workloads while ensuring clinical supervisors are routinely observing candidates.

The Department proposes to recodify N.J.A.C. 6A:9A-3.3(e), which describes the qualifications of school district faculty supervising clinical interns, as N.J.A.C. 6A:9A-4.4(h). The Department proposes to replace “[d]istrict faculty” with “[a] school district cooperating teacher” to specify the person responsible for providing guidance and assistance to a clinical intern. The Department also proposes to replace “supervise teacher candidates” with “guide and direct candidates” because it more accurately describes a cooperating teacher’s role. The Department also proposes at N.J.A.C. 6A:9A-4.4(h)1 to replace “principal and district office” with “chief school administrator or his or her designee” as the chief school administrator is in charge of school district placements. The Department also proposes to amend N.J.A.C. 6A:9A-4.4(h)1 to replace “preparing institution of higher education” with “CEAS educator preparation program” to require school districts to solicit input from the educator preparation program prior to placing clinical interns in the classroom, which will ensure candidates are a good match for the clinical practice placement.

The Department proposes new N.J.A.C. 6A:9A-4.4(h)6 to require cooperating teachers providing guidance and assistance to candidates to be rated, beginning August 1, 2016, as effective or highly effective on their most recently received summative evaluations. The Department also proposes new N.J.A.C. 6A:9A-4.4(h)6i to require a cooperating teacher in a school not required pursuant to educator evaluation rules at N.J.A.C. 6A:10-1 to issue summative evaluations to demonstrate one year of effective teaching as determined by the teacher’s supervisor. The proposed subparagraph will ensure clinical interns are observing and learning from high-quality teachers prior to taking full control of the classroom.

The Department proposes to recodify the first sentence of N.J.A.C. 6A:9A-3.3(d), which requires cooperating teachers to provide continuous supervision and weekly conferences to assist teacher candidates in professional development, as N.J.A.C. 6A:9A-4.4(i) and (i)1. The Department proposes at recodified N.J.A.C. 6A:9A-4.4(i)1 to replace “supervision” with “guidance and direction” because, according to stakeholders, it more accurately describes a cooperating teacher’s role in the candidate’s development. The Department also proposes to delete the second sentence of N.J.A.C. 6A:9A-3.3(d), which provides a definition for “cooperating teacher.” A definition for the term is being proposed at N.J.A.C. 6A:9-2 in a separate rulemaking. The Department also proposes new N.J.A.C. 6A:9A-3.3(i)2 to require a cooperating teacher to consult the chief school administrator or his or her designee about the teacher candidate’s placement, but final placement decision on teacher candidate and cooperating teacher pairings remain with the chief school administrator or designee. The Department has heard from members of the preschool-12 community that teachers are more likely to volunteer as cooperating teachers when they know they will be consulted about a teacher candidate prior to placement.

The Department proposes to recodify N.J.A.C. 6A:9A-3.3(e), which describes the responsibility of institutions of higher education preparing teachers to provide the cooperating teacher with professional development opportunities and experiences that increase his or her expertise in the field, as N.J.A.C. 6A:9A-4.4(j).

**Proposed N.J.A.C. 6A:9A-4.5 Recommendations for a certificate of eligibility with advanced standing (CEAS)**

The Department proposes N.J.A.C. 6A:9A-4.5, Recommendations for a certificate of eligibility with advanced standing (CEAS), to provide requirements for CEAS educator preparation programs recommending candidates for certification upon program completion.

The Department proposes to relocate N.J.A.C. 6A:9A-3.1(k), which requires colleges and universities to recommend candidates for CEAS, as N.J.A.C. 6A:9A-4.5(a).

The Department proposes to relocate N.J.A.C. 6A:9A-3.1(g), which requires colleges and universities to recommend for certification only candidates who have completed the State-approved certification program and have met other specified criteria, as N.J.A.C. 6A:9A-4.5(a)1. The Department proposes to recodify N.J.A.C. 6A:9A-4.5(a)1 to replace "State-approved certificate program" with "CEAS educator preparation program" because a candidate must complete a CEAS educator preparation program, not just a State-approved certificate program, to qualify for the CEAS.

The Department proposes to relocate N.J.A.C. 6A:9A-3.1(g)1, which requires candidates to have completed requirements in N.J.A.C. 6A:9B-8.1(a) and (c) and allows institutions to apply exceptions, as N.J.A.C. 6A:9A-4.5(a)2. The Department proposes to replace "N.J.A.C. 6A:9B-8.1(a) and (c)" with "N.J.A.C. 6A:9B-8 through 13" to reflect N.J.A.C. 6A:9B's reorganization and to clarify candidates must meet certification requirements and requirements for the endorsement they seek to be eligible for a CEAS, which appear at N.J.A.C. 6A:9B-9 through 13.

The Department proposes to relocate N.J.A.C. 6A:9A-3.1(g)2, which requires candidates to showcase through assessments their competence, aptitude, motivation, and potential for outstanding success in teaching, as N.J.A.C. 6A:9A-4.5(a)3. The Department proposes to delete reference to assessments and the requirement for the assessments to be communicated to the student and kept in his or her file because a candidate will be required to pass a performance assessment pursuant to N.J.A.C. 6A:9B as proposed in a separate rulemaking. The Department also proposes to replace "success in teaching" with "success in educating students" to clarify the rule's intent.

The Department proposes to relocate and amend N.J.A.C. 6A:9A-3.1(l), which requires colleges and universities to notify the Department when a student has completed a program within the part year and is being recommended for a CEAS, as N.J.A.C. 6A:9A-4.5(b). The Department proposes to rewrite the subsection as "CEAS educator preparation programs shall have up to one year from the date the candidate completed the approved program to recommend him or her to the Department for issuance of a certificate" to simplify the provision and eliminate redundancy.

**Proposed N.J.A.C. 6A:9A-4.6 Post-baccalaureate and graduate-level educator preparation programs (Current N.J.A.C. 6A:9A-3.4)**

The Department proposes to recodify N.J.A.C. 6A:9A-3.4, which describes requirements for post-baccalaureate and graduate-level teacher preparation program, as N.J.A.C. 6A:9A-4.6. The Department proposes to replace "teacher preparation program" with "educator preparation program" in the heading to align with the term used to describe all programs leading to instructional, administrative, or educational services certification.

The Department proposes to recodify N.J.A.C. 6A:9A-3.4(a), which requires a post-baccalaureate or graduate-level educator preparation program that leads to a recommendation for a CEAS to require students to meet six requirements, as N.J.A.C. 6A:9A-4.6(a). The Department proposes to amend N.J.A.C. 6A:9A-4.6(a) to require all CEAS educator preparation program types to meet requirements as described in this subchapter and in N.J.A.C. 6A:9A-3. The Department also proposes to include Master of Arts in Teaching (MAT) program because they are graduate-level educator preparation programs. Substantially amending N.J.A.C. 6A:9A-4.4(a) will ensure all educators prepared through a CEAS educator preparation program receive the same minimum training regardless of program level or type.

The Department proposes to delete N.J.A.C. 6A:9A-3.4(a)1 through 6, which describe specific program entry requirements and program components for post-baccalaureate and graduate-level programs, because all CEAS educator preparation programs will be required, regardless of level, to align with the requirements at N.J.A.C. 6A:9A-4.3.

The Department proposes to delete N.J.A.C. 6A:9A-3.2(a)5i, which allows a student teaching experience through the MAT program to meet the student teaching requirement, because N.J.A.C. 6A:9A-3.2(a)5ii will be recodified and amended to include this exception. The Department also proposes to relocate with amendments current N.J.A.C. 6A:9A-3.2(a)5ii through iv, which describe exceptions to the clinical practice requirement for candidates enrolled in MAT program, as N.J.A.C. 6A:9A-4.6(b) and (b)1 through 3. The Department proposes at N.J.A.C. 6A:9A-4.6(b)3, which exempts from the clinical components any candidate who can demonstrate at least one year of effective teaching under a valid out-of-State license or certificate, to replace "out-of-State license or certificate" with "in- or out-of-State license or certificate" to clarify the rule's intent to apply to both in- and out-of-State candidates.

#### **Proposed Subchapter 5. CE Educator Preparation Programs**

The Department proposes new N.J.A.C. 6A:9A-5, CE Educator Preparation Programs, to set forth the required components of CE educator preparation programs. The proposed subchapter will separate the minimum program procedure and component requirements for CEAS educator preparation programs from the requirements for CE educator preparation programs.

Through the proposed subchapter, criteria and expectations for CE educator preparation programs will be more transparent and clear. Also, the Department proposes to adjust current practices. For instance, the Department no longer will place candidates in programs; rather, CE programs will choose which candidates enter their programs. Effective in the 2017-2018 academic year, teacher candidates also will be required to complete at least 50 hours of pre-professional experience, rather than 24 hours, and the Department proposes to require clinical experiences to be included with the pre-professional experience. Finally, the Department proposes to allow programs to admit candidates only in cohorts so all students in a cohort start the program at the same time instead of allowing candidates to start a program at any point during the year. The proposed new rules will promote consistency and continuity within an educator's preparation.

#### **Proposed N.J.A.C. 6A:9A-5.1 CE educator preparation program implementation**

The Department proposes N.J.A.C. 6A:9A-5.1, General program implementation. This section provides an overview of the requirements, procedures, and components for CE educator preparation programs to ensure specific program procedures and components are met prior to program approval.

The Department proposes N.J.A.C. 6A:9A-5.1(a) to require CE educator preparation programs to implement the subchapter's requirements and to stipulate the requirements are to be considered minimum requirements allowing candidates to demonstrate higher levels of proficiency or competency for program admission and completion and must be applied in a non-discriminatory manner to all candidates, including transfer candidates. Proposed N.J.A.C. 6A:9A-5.1(a)1 also will require all admissions and retention processes to be consistent with State and provider affirmative action policies and goals. The proposed subsection provides consistency between CEAS educator preparation requirements at proposed N.J.A.C. 6A:9A-4.1(a) and (b) and CE educator preparation program requirements.

The Department proposes N.J.A.C. 6A:9A-5.1(b) to require programs to develop procedures in compliance with the subchapter. The Department also proposes N.J.A.C. 6A:9A-5.1(b)1 through 5 to require CE educator preparation program procedures and components to include admission; a pre-professional component; curriculum and coursework requirements; program completion; and submission of educator preparation program data at the Department's request.

#### **Proposed N.J.A.C. 6A:9A-5.2 Admission to CE educator preparation programs**

The Department proposes N.J.A.C. 6A:9A-5.2 to set forth CE educator preparation program admission requirements, including the current requirement for all accepted candidates to have a CE.

The Department proposes N.J.A.C. 6A:9A-5.2(a) to require CE educator preparation programs to admit a candidate only if he or she has completed by the start of the program the CE requirements, including endorsement requirements at N.J.A.C. 6A:9B-9. The Department proposes N.J.A.C. 6A:9A-5.2(a)1 to require candidates accepted to CE educator preparation programs for documented areas of teacher shortage to meet only the endorsement requirements in N.J.A.C. 6A:9A-5.6.

The Department also proposes N.J.A.C. 6A:9A-5.2(b) to require CE programs enrolling candidates for academic year 2017-2018, or thereafter, to accept candidates as a cohort that starts the program at the same time. Department policy stipulates that candidates can be selected by programs rather than being placed by the Department and that a cohort model provides the most cohesive preparation structure as it prohibits programs from allowing candidates to start at varying times throughout the semester.

The Department also proposes N.J.A.C. 6A:9A-5.2(b)1 to require CE educator preparation programs enrolling candidates prior to academic year 2017-2018 to continue operating under existing current contracts with the Department until academic year 2017-2018 begins. The proposed paragraph will provide flexibility for candidates currently enrolled or planning to enroll in CE educator preparation programs.

#### **Proposed N.J.A.C. 6A:9A-5.3 Pre-professional component for CE educator preparation programs**

The Department proposes N.J.A.C. 6A:9A-5.3 to stipulate the pre-professional requirements candidates must complete prior to beginning a full-time professional teaching experience.

The Department proposes to relocate and substantially amend N.J.A.C. 6A:9B-8.1(a)4, which requires a 24-hour pre-service component prior to earning a CE, as N.J.A.C. 6A:9A-5.3(a).

The Department proposes to amend the 24-hour requirement to a 50-hour pre-professional component as the current requirement does not provide adequate time for candidates to gain exposure to the classroom through clinical experiences. The proposed increase would be effective for candidates starting the CE educator preparation program in academic year 2017-2018 or thereafter. The Department proposes N.J.A.C. 6A:9A-5.3(a)1 to require 15 of the 50 hours of pre-professional experience to consist of coursework. The Department proposes N.J.A.C. 6A:9A-5.3(a)2 to require the pre-professional experience to include a minimum of 20 hours of clinical experience(s), which must include at least 10 hours of planning and delivering instruction through an individual or co-teaching model. Currently, the Department does not require candidates to spend any of their required 24 hours of pre-service in the classroom. The amount of time candidates spend in practical experiences provides greater exposure to classrooms and a chance to demonstrate potential as a full-time teacher. Finally, the Department proposes N.J.A.C. 6A:9A-5.3(a)3 to allow programs to determine what a candidate is required to do/study in the remaining 15 hours of pre-professional experience.

The Department proposes N.J.A.C. 6A:9A-5.3(b) to require a candidate starting a CE educator preparation program prior to academic year 2017-2018 to complete, pursuant to N.J.A.C. 6A:9B-8.3(i)5, the current 24 hours of study prior to his or her full-time professional teaching experience. The proposed subsection will ensure candidates entering programs prior to the effective date of the new requirements still engage in a pre-professional experience before teaching full-time.

**Proposed N.J.A.C. 6A:9A-5.4 Additional curriculum and course requirements for CE educator preparation programs**

The Department proposes to relocate N.J.A.C. 6A:9B-8.3(c)1, which requires CE educator preparation program candidates to complete 200 hours of formal training over the course of one year, as N.J.A.C. 6A:9A-5.4 to separate program requirements from candidate certification requirements.

The Department proposes N.J.A.C. 6A:9A-5.4(a) to establish the regulations that apply to candidates starting a CE educator preparation program in academic year 2017-2018 or thereafter. The Department proposes at N.J.A.C. 6A:9A-5.4(a)1 to increase, starting in the 2017-2018 academic year, the required hours of instruction to 350 hours to be completed over the course of a minimum of two years. The proposed increase in instructional hours will provide candidates with more support during their novice professional experience and the extension to two years will ensure adequate time for candidates to engage in curriculum aligned to the State's Professional Standards for Teachers. The proposed paragraph also reflects current practices across the State as some programs currently provide more coursework and classroom time than the 200-hour minimum currently required at N.J.A.C. 6A:9B-8.3(c)1. The Department also proposes at N.J.A.C. 6A:9A-5.4(a) to specify a CE educator preparation program must include either 350 hours of formal instruction or 24 semester-hour credits to reflect current practice as some programs operate credit-bearing CE educator preparation programs.

The Department proposes N.J.A.C. 6A:9A-5.4(a)1i to allow a CE educator preparation program to accept up to 100 out of the total 350 formal instruction hours or up to six semester-hour credits from another approved educator preparation program so a candidate with former training in a CE educator preparation program or a CEAS educator preparation program may apply his or her credit or training hours to the minimum required 350 hours or 24 semester-hour credits at the CE educator preparation program's discretion.

The Department proposes N.J.A.C. 6A:9A-5.4(a)2 to require the CE educator preparation program curriculum to build upon the content and skills of an individual candidate to ensure a coherent sequence or preparation for candidates. The Department proposes N.J.A.C. 6A:9A-5.4(a)3 to require programs to align curriculum with the State's Professional Standards for Teachers at N.J.A.C. 6A:9A-3.3 to reflect current practice.

The Department proposes N.J.A.C. 6A:9A-5.4(b) to require candidates starting a CE educator preparation program prior to academic year 2017-2018 to complete a minimum of 200 formal instructional hours in a curriculum devoted to professional educator preparation that builds upon the content and skills of an individual candidate and aligned to the Professional Standards for Teachers, except as indicated in N.J.A.C. 6A:9A-5.4(b)1. The Department also proposes to allow candidates to complete 13 semester-hour credits at an approved CE educator preparation program as an alternative to the 200 hours of formal instruction, which reflects current practice as some program providers operate credit-bearing CE educator preparation programs.

The Department proposes to relocate N.J.A.C. 6A:9B-8.3(c)3, which requires provisional teachers who are holders of an elementary school (K-6 and N-8) CE to complete 290 hours of formal instruction over the course of two years in specific subject areas, as N.J.A.C. 6A:9A-5.4(b)1. The Department also proposes to allow candidates to complete 20 semester-hour credits at an approved CE educator preparation program as an alternative to the 290 hours of formal instruction. The Department proposes in N.J.A.C. 6A:9A-5.4(b)1 that requires 45 hours of study to allow, in N.J.A.C. 6A:9A-5.4(b)1i, a candidate to complete "45 hours of study or three semester hour credits" to align with other proposed amendments allowing a candidate to complete an hour-based or credit-bearing program. This flexibility reflects current practice as some program providers operate credit-bearing CE educator preparation programs. The proposed relocation highlights that a CE holder with an elementary school (K-6 and N-8) endorsement must abide by current requirements until the new requirements go into effect in academic year 2017-2018.

**Proposed N.J.A.C. 6A:9A-5.5 Completion of CE educator preparation program**

The Department proposes N.J.A.C. 6A:9A-5.5(a) to strengthen CE educator preparation program requirements by increasing the minimum number instructional hours from 200 to 350, pursuant to N.J.A.C. 6A:9A-5.4, and by requiring CE educator preparation program candidates who begin a program in academic year 2017-2018, or thereafter, to pass a Commissioner-approved performance assessment, which currently is not required. Strengthening program completion requirements will ensure CE candidates have met acceptable minimum requisites similar to CEAS educator preparation program requirements.

The Department proposes N.J.A.C. 6A:9A-5.5(b) to allow a candidate who fails to complete the CE educator preparation program after two years to renew his or her provisional license and to remain in the current CE educator preparation program or be accepted into a new one. Allowing for a two-year renewal of the provisional license will provide programs flexibility to continue supporting promising candidates in the classroom who have not completed the program within two years.

**Proposed N.J.A.C. 6A:9A-5.6 CE educator preparation programs for documented areas of teacher shortage (Current N.J.A.C. 6A:9B-14)**

The Department proposes to relocate N.J.A.C. 6A:9B-14 as N.J.A.C. 6A:9A-5.6 to explain approval requirements for CE educator preparation programs for documented areas of teacher shortage. This section applies to existing programs including the CE educator preparation

programs implemented in 2012 as a pilot program pursuant to P.L. 2012, c. 11, through which current teachers without science and math endorsements can earn the endorsements.

The Department proposes N.J.A.C. 6A:9A-5.6(a), which embodies the purpose at N.J.A.C. 6A:9B-14.1, to allow CE educator preparation programs to be developed to serve school districts to place teachers in documented areas of teacher shortage and to be established by New Jersey colleges and universities, educational organizations, or other entities approved by the Commissioner.

The Department proposes to relocate N.J.A.C. 6A:9B-14.2(a) and (b), which authorize the Commissioner to approve CE educator preparation programs for middle school with subject-matter specialization in any document area of teacher shortage and for preschool through grade 12 in any documented area of teacher shortage, to N.J.A.C. 6A:9A-5.6(b)1 and 2.

The Department proposes N.J.A.C. 6A:9A-5.6(c) to ensure Commissioner-approved programs in the section meet all other CE educator preparation program requirements at N.J.A.C. 6A:9A-3. The proposed subsection aligns to amendments at N.J.A.C. 6A:9A-3.1(b)3 and 4 as the Department seeks to base program approval on meeting the chapter's minimum criteria rather than the submission of specific documentation. Therefore, the CE preparation programs approved under this section must meet the criteria in N.J.A.C. 6A:9A-3 and provide evidence required at N.J.A.C. 6A:9A-5.6(c)1 rather than submit to the Department the precise documentation listed at N.J.A.C. 6A:9B-14.3. The Department proposes N.J.A.C. 6A:9A-5.6(c)1 to require a CE educator preparation program for documented teacher-shortage areas to provide to the Commissioner evidence it provides content-specific courses and content-based pedagogy that prepare a candidate to teach in his or her subject area. The proposed provision will ensure all teacher candidates acquire the specific pedagogical skills needed to excel in their respective fields while eliminating overly burdensome documentation requirements for the CE preparation programs.

The Department proposes N.J.A.C. 6A:9A-5.6(d) to allow the Commissioner to approve CE educator preparation programs designed to prepare candidates to serve in teacher shortage areas. The Department proposes N.J.A.C. 6A:9A-5.6(d)1 to state alternate endorsement requirements for admission into a CE educator preparation programs designed to prepare educators to serve in teacher shortage area. The Department proposes N.J.A.C. 6A:9A-5.6(d)1i to require admission to the CE educator preparation program for documented areas of teacher shortage to be contingent upon a candidate passing a content-based subject test in lieu of course requirement. The Department proposes N.J.A.C. 6A:9A-5.6(d)1ii to require candidates without the appropriate coursework required for an endorsement to complete alternative program coursework. This subsection embodies the alternative endorsement requirements in N.J.A.C. 6A:9B-14.2(c). Therefore, the Department does not intend through this proposal to change the endorsement requirements for a candidate in a CE educator preparation program for documented teacher shortage area approved under this section or existing programs approved under N.J.A.C. 6A:9B-14.

The Department proposes N.J.A.C. 6A:9A-5.6(e) to allow subject-specific coursework hours provided by a preparation program designed to prepare candidates to serve in teacher shortage areas to be applied to the minimum 50 hours of pre-professional experience required pursuant to proposed N.J.A.C. 6A:9A-5.3 and/or to the 350 hours of formal instruction required pursuant to proposed N.J.A.C. 6A:9A-5.4. The proposed subsection provides additional flexibility with regard to program requirements for candidates who will be serving in documented areas of teacher shortage.

As the Department has provided a 60-day comment period in this notice of proposal, this notice is exempted from the rulemaking calendar requirement, pursuant to N.J.A.C. 1:30-3.3(a)5.

#### Social Impact

The rules proposed for re-adoption with amendments and new rules will have a positive social impact on students, teacher candidates, school districts, and CEAS and CE educator preparation programs. The rules proposed for re-adoption with amendments and new rules will better prepare novice teachers to handle rigorous work and enable them to be more effective in the earlier years of their careers. The enhanced selectivity and rigor of CEAS and CE educator preparation programs will enhance the professionalism of teaching.

The rules proposed for re-adoption with amendments and new rules will lead to stronger novice teachers for students, thus enabling school districts to provide higher-level coaching and support rather than remedial pedagogical training. The rules proposed for re-adoption with amendments and new rules will provide for a more thorough data collection, which will better inform teacher candidates and school districts about program and hiring decisions as well as pipeline development.

Finally, the rules proposed for re-adoption with amendments and new rules will clarify the Department's expectations and criteria for approval, particularly for CE educator preparation programs, as current rules only minimally describe the criteria and process for approval. As there already is an increasing amount of collaboration across CEAS and CE educator preparation programs, the improved alignment in the rules proposed for re-adoption with amendments and new rules will further encourage and enhance information sharing among providers.

#### Economic Impact

The rules proposed for re-adoption with amendments and new rules will have a minimal financial impact on individual candidates completing a CEAS educator preparation program. The increased CE educator preparation program course requirements, which are proposed as a two-year program rather than the current one-year program, may increase program costs for candidates with a CE who are enrolled in CE educator preparation programs. However, the rules proposed for re-adoption with amendments and new rules do not mandate fee increases. Also, the performance assessment requirement will lead to additional costs for candidates. As the Commissioner has not yet approved a performance assessment provider, the exact cost is unknown.

The rules proposed for re-adoption with amendments and new rules may increase the need for more clinical supervisors and school district cooperating teachers who are already working in the educator preparation program or within the school district to accommodate the longer duration. However, some of the increased costs may be offset by the greater flexibility in course requirements. Costs to school districts may be offset by a reduction in school district-specific training costs if a school district chooses to hire a clinical intern who has completed a full school year of clinical practice rather than just a semester.

#### Jobs Impact

It is not anticipated that jobs will be either generated or lost as a result of the rules proposed for re-adoption with amendments and new rules.

#### Agriculture Industry Impact



The rules proposed for re adoption with amendments and new rules will have no impact on the agriculture industry.

#### **Federal Standards Statement**

The rule proposed for re adoption with amendments and new rules will further align New Jersey's regulations with Federal requirements under the No Child Left Behind Act (PL 107-110) and ensure New Jersey's public school system prepares students for postsecondary education and the 21st century workplace. The rules proposed for re adoption with amendments and new rules are in compliance with Federal regulations.

#### **Regulatory Flexibility Statement**

A regulatory flexibility analysis is not required because the rules proposed for re adoption with amendments and new rules do not impose recording, recordkeeping, or other compliance requirements on small businesses as defined in the Regulatory Flexibility Act, N.J.S.A. 52:14B-16 et seq. The rules proposed for re adoption with amendments and new rules solely impact individual educators, school districts, and educator preparation programs in New Jersey, which are affiliated with school districts or higher education providers that employ more than 100 people.

#### **Housing Affordability Impact Analysis**

There is no anticipated impact on the cost of housing as a result of the rules proposed for re adoption with amendments and new rules solely impact individual educators, school districts, and educator preparation programs in New Jersey.

#### **Smart Growth Development Impact Analysis**

The rules proposed for re adoption with amendments and new rules will have no impact on the cost of housing, the number of housing units, or new construction within Planning Areas 1 and 2, or within designated centers, under the State Development and Redevelopment Plan. The rules proposed for re adoption with amendments and new rules solely impact individual educators, school districts, and educator preparation programs in New Jersey.

Full text of the proposed amendments and new rules follows (additions indicated in boldface **thus**; deletions indicated in brackets [thus]):

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## N.J.A.C. 6A:9A, NEW JERSEY EDUCATOR PREPARATION PROGRAMS

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*Document 4***CHAPTER 9A. NEW JERSEY EDUCATOR PREPARATION PROGRAMS****SUBCHAPTER 1. [(RESERVED)] SCOPE AND PURPOSE****6A:9A-1.1 Scope**

**This chapter sets forth the rules governing the approval of CEAS and CE educator preparation programs and their content. It also contains the rules governing the preparation of educators and candidates that is required for certification.**

**6A:9A-1.2 Purpose**

- (a) The purpose of this chapter is to establish a system of educator preparation programs that continuously serves to improve the quality of instruction for New Jersey's children preparing them for post-secondary education and/or careers.**
- (b) Educator preparation programs shall function along a continuum of rigorous pre-professional preparation, certification, and professional development to prepare educators to support improved student achievement of the Core Curriculum Content Standards (CCCS).**

**SUBCHAPTER 2. DEFINITIONS****6A:9A-2.1 Definitions**

The definitions set forth in N.J.A.C. 6A:9-2.1 shall apply to the words and terms used in this chapter.

**SUBCHAPTER 3. [STANDARDS FOR NEW JERSEY] EDUCATOR PREPARATION  
[PROGRAMS IN HIGHER EDUCATION] PROGRAM APPROVAL**

**6A:9A-3.1 [Requirements and standards for the approval of professional education]  
Approval criteria of educator preparation programs [preparing educational personnel]**

- [(a) The Department shall establish a three-tiered system of program approval to include program approval committees, a State Program Approval Council, and final approval through the Department as follows:
1. The Department shall appoint program approval committees for each certificate area to recommend appropriate action regarding the addition of a new or substantially revised certification program to the State Program Approval Council based on documents and evidence of meeting program standards as specified in this subchapter.
    - i. The program approval committees shall be comprised of three members representing higher education and K-12 school districts who have expertise in the certification program under review.
  2. The Commissioner shall appoint a State Program Approval Council comprised of 11 members, including six higher education representatives and five P-12 practitioners.
    - i. The Council shall advise the Commissioner on matters pertaining to higher education teacher, administrator, and educational service personnel preparation quality issues;

- ii. The Council shall coordinate the peer review program approval process for initial and substantially revised programs and the periodic review of programs;
  - iii. The Council shall review program information required for the periodic review of programs and recommend appropriate action regarding the program's status; and
  - iv. The Council shall make final recommendations regarding approval of programs to the Department.
3. Based on the recommendation of the State Program Approval Council, the Department shall take appropriate action regarding program approval.]
- [(b)] (a) The [Department] **Commissioner** shall approve all [professional] educator preparation programs [leading] **designed to lead** to State certification, [in New Jersey institutions of higher education. The scope of program approval shall include] **including: educator preparation** programs from **higher education** institutions chartered in the State[, as well as] and programs that have a physical presence in New Jersey [and] **but** are run by out-of-State institutions that are approved by the New Jersey Secretary of Higher Education[.]; **and educator preparation programs established by educational organizations, school districts or consortia, or Commissioner-approved entities.**
- (b) [Program] **Educator preparation program** approval shall be based on the following [criteria]:
- 1. Compliance with State [professional standards for teachers and school leaders] **Professional Standards for Teachers and Professional Standards for School Leaders** as established in N.J.A.C. 6A:9-3.3 and 3.4;

- [2. Compliance with State content-specific professional standards by licensure area that will be implemented by the Department for its review of new or substantially revised programs;
3. Program documentation for the initial review and approval of all new or substantially revised programs shall include, but not be limited to:
  - i. A summary of the proposed program;
  - ii. The program framework and guiding principles;
  - iii. Program alignment to the professional content standards;
  - iv. Description of the field experiences;
  - v. Description of student performance assessments and evidence of program outcomes;
  - vi. Program faculty resumes; and
  - vii. Course syllabi and program curriculum;
4. The following documentation shall be reviewed by the State Program Approval Council and be used for the periodic review and approval for continuation of all preparation programs in conjunction with the institution's national accreditation:
  - i. Data on candidates' performance on program based assessments at program completion;
  - ii. Numbers of educator candidates prepared in critical shortage areas and from diverse backgrounds;
  - iii. Placement and retention rates;
  - iv. Data on candidates' performance at the end of the provisional period;
  - v. Praxis scores and pass rates;
  - vi. Follow-up survey of graduates and employers; and
  - vii. Where relevant, P-12 student achievement data;

5. Accreditation by a national accrediting body recognized by the Council on Higher Education Accreditation and approved by the Commissioner; and
  6. Compliance with requirements in (c) below.]
  2. **The following accreditation requirements:**
    - i. **For CEAS educator preparation programs, accreditation through NCATE, the TEAC, the CAEP, or any other professional education accreditation body recognized by the CHEA or approved by the Commissioner; or**
    - ii. **For CE educator preparation programs designed to lead to an instructional certificate, accreditation by January 1, 2022, through NCATE, the TEAC, the CAEP, or any other professional education accreditation body recognized by the CHEA or approved by the Commissioner;**
  3. **Compliance with educator preparation program requirements in this chapter or in N.J.A.C. 6A:9B, as applicable; and**
  4. **Performance, as indicated by the required documentation in N.J.A.C. 6A:9A-3.2(f), for operating programs.**
- [(c) Higher education institutions that prepare educators shall be required to have programs approved as follows:
1. All new or revised educator programs must secure initial approval from the Department prior to implementation;
  2. All educator programs must undergo a periodic program review every seven years at least six months prior to the national accreditation process;
  3. All programs must obtain accreditation through the National Council for the Accreditation of Teacher Education, the Teacher Education Accreditation

Council, or any other national professional education accreditation body recognized by the Council on Higher Education Accreditation and the Commissioner.

- i. Institutions of higher education preparing professional educators that fail to obtain national accreditation shall forfeit State approval to offer professional educator preparation programs leading to certification.
  - ii. The State shall withdraw approval for any institution of higher education preparing professional educators that fails to meet the conditions in (c)3i above.
- (d) Formal admission to teacher preparation programs shall be reviewed by colleges and universities at the beginning of the junior year and shall be granted only if:
1. The average cumulative GPA of the accepted cohort of candidates as of September 1, 2015, is at least 3.00 when a grade point of 4.00 equals an A grade for the first two years of college and each accepted individual candidate shall achieve at least a 2.75. Candidates admitted prior to September 1, 2015, shall have maintained an individual cumulative GPA of at least 2.50 when a grade point of 4.00 equals an A grade for the first two years of college. Institutions may require higher minimum GPAs for entry into teacher preparation programs;
  2. The accepted candidates achieved acceptable levels of proficiency in the use of the English language, both oral and written, and mathematics. Students with deficiencies in these areas upon admission to college shall be required to demonstrate proficiency through an oral or written assessment by the beginning of the junior year. As of September 1, 2015, all accepted candidates shall have achieved a minimum score established by the Department on a Commissioner-approved test of basic reading, writing, and mathematics skills, or score at least a



- 1660 combined critical reading, writing, and mathematics on the SAT, at least a 23 on the ACT, or at least a 4.0 on the analytical writing section and a combined score of 310 on the quantitative and verbal sections of the GRE; and
3. The accepted candidates demonstrated aptitude for the profession of teaching through successful completion of an appropriate practical experience in an elementary or secondary school.
- (e) The college or university faculty shall evaluate each student at the end of the semester prior to student teaching. The faculty evaluation shall be based on a comprehensive assessment of relevant indicators that include:
1. An individual cumulative GPA of at least 3.00 when a grade point of 4.00 equals an A grade; and
  2. Acceptable levels of teaching proficiency in junior field experience as indicated by the evaluation reports of college and school faculty. Such evaluations shall be communicated to the student and shall be included in the student's permanent file.
- (f) Colleges and universities shall assure that only students who have met the requirements in (d) above be assigned to student teaching.
- (g) Colleges and universities shall recommend for certification to the Department only students who have completed the State-approved certification program and have:
1. Completed all requirements as described in N.J.A.C. 6A:9B-8.1(a) and (c).  
Colleges and universities are not required to apply exceptions outlined in N.J.A.C. 6A:9B-8.1(a)2i, iii, or iv, but may do so at their discretion.
  2. Demonstrated continued competence, aptitude, motivation, and potential for outstanding success in teaching as indicated by assessments of student teaching performance by college/university and school supervisors. Such assessments shall be communicated to the student and shall be a part of the student's file.

3. For students who graduate after September 1, 2016, passed a Commissioner-approved performance-based assessment of teaching.
- (h) At the request of the Department, institutions shall submit teacher preparation program data at a program level.
  - (i) All requirements shall be applied equitably and in a non-discriminatory manner to all students, including transfer students. All admissions and retention processes shall be consistent with State and institutional affirmative action policies and goals.
  - (j) Colleges and universities shall develop appropriate procedures for placing on probation and dismissing from the program students who fall below minimum requirements before graduation, and shall incorporate into the procedures methods for appeals by students.
  - (k) Colleges and universities shall make recommendations for issuance of a CEAS for students completing an approved teacher preparation program.
  - (l) Colleges and universities shall inform the Department when a student has successfully completed the approved program and is being recommended to the Department for issuance of the CEAS by the Board of Examiners provided the student has passed a State test pursuant to N.J.A.C. 6A:9B-8.1(a)4. Colleges and universities shall have up to one year from the date of completion of the approved program to recommend a student to the Department for issuance of a certificate.
  - (m) Colleges and universities shall align their programs with the Professional Standards for Teachers.
  - (n) With the exception of special education approved programs, colleges and universities shall inform the Department of students who have matriculated in programs approved prior to January 20, 2004. Students who matriculated as juniors in fall 2004 and spring 2005 shall have completed all requirements at N.J.A.C. 6:11-7 by September 1, 2007.

Candidates who did not complete all requirements at N.J.A.C. 6:11-7 by September 1, 2007, shall fulfill the requirements at N.J.A.C. 6A:9A-3.

- (o) Colleges and universities shall inform the Department of students who matriculated in special education programs approved prior to January 20, 2004. This includes students who matriculated as freshman in fall 2003. Candidates who did not complete all of the requirements at N.J.A.C. 6:11-7 by September 1, 2008, shall fulfill the requirements at N.J.A.C. 6A:9A-3. These teachers shall be considered novice teachers and shall be required to complete a year of formal mentoring.
- (p) Requirements in (d) through (g) above shall be considered minimum requirements. Colleges and universities may require higher GPAs and higher levels of proficiency for program admission, student teaching, and recommendation for certification.]
- (c) **If the program provider operates an educator preparation program, the Commissioner may consider available data and performance evidence from the program provider's operating educator preparation program(s) before approving any new program under the same program provider.**

**6A:9A-3.2 Approval process for educator preparation programs**

- (a) **The Commissioner has the authority and discretion to approve all new or substantially revised educator preparation programs and he or she shall consider the State Program Approval Council's analysis of the proposed program and its recommendation for approval.**
- (b) **The Commissioner shall appoint a State Program Approval Council and shall consult the Council on matters pertaining to the quality of educator preparation programs designed to lead to an instructional certificate as required for teachers**

pursuant to N.J.A.C. 6A:9B-8, an administrative certificate as required for administrators pursuant to N.J.A.C. 6A:9B-12, and an educational service certificate as required for educational service personnel pursuant to N.J.A.C. 6A:9B-14. The State Program Approval Council shall be comprised of no more than 11 members who shall serve two-year, renewable terms. The State Program Approval Council shall include:

1. Four representatives from CEAS educator preparation programs;
  2. Three representatives from CE educator preparation programs; and
  3. Four practitioners from preschool through grade 12 schools.
- (c) All new or substantially revised educator preparation programs shall secure approval from the Commissioner prior to implementation.
1. If changes are made to the educator preparation program's course content or requirements, or clinical component structure or requirements, the program shall be considered substantially revised.
- (d) The Commissioner shall re-approve all educator preparation programs at least every seven years and has the authority and discretion to periodically review educator preparation programs more frequently at his or her discretion.
- (e) The Commissioner shall withdraw approval or require an educator preparation program to take corrective action if he or she determines the program has failed, or is at risk of failing, to meet the criteria in N.J.A.C. 6A:9A-3.1(b).
- (f) Documentation for the Commissioner's periodic review of educator preparation programs shall include, but not be limited to, the following:
1. Candidate performance assessment scores and pass rates;
  2. Numbers of educator candidates prepared in teacher shortage areas and from diverse backgrounds;

3. Placement and retention rates;
4. Evaluation data based on initial year(s) of teaching;
5. Scores and pass rates on State test(s) of subject matter knowledge and a Commissioner-approved test of basic reading, writing, and mathematics skills;
6. Follow-up survey of graduates and employers; and
7. Preschool through grade 12 student achievement data, when relevant.

#### **SUBCHAPTER 4. CEAS EDUCATOR PREPARATION PROGRAMS**

##### **6A:9A-4.1 CEAS educator preparation program implementation**

- (a) CEAS educator preparation programs shall implement the program requirements pursuant to this subchapter, which shall be:
  1. Applied equitably and in a non-discriminatory manner to all candidates, including transfer students. All admissions and retention processes shall be consistent with State and institutional affirmative action policies and goals; and
  2. Considered minimum requirements. Higher education institutions and/or their CEAS educator preparation programs may require higher GPAs and higher levels of proficiency for educator preparation program admission, clinical component, and recommendation for certification.
- (b) CEAS educator preparation programs shall develop procedures in compliance with this subchapter. The program procedures and components shall include:
  1. Course requirements, pursuant to N.J.A.C. 6A:9A-4.2;

2. **Formal admission to the educator preparation program, pursuant to N.J.A.C. 6A:9A-4.3;**
3. **Clinical component and the supervision of clinical practice, pursuant to N.J.A.C. 6A:9A-4.4;**
4. **Procedures for placing on probation, and dismissal from the program, candidates who fall below minimum requirements before graduation, including procedures for student appeals;**
5. **Recommendation of a candidate for a CEAS, pursuant to N.J.A.C. 6A:9A-4.4, including certification to the Department that a candidate has completed the CEAS requirements; and**
6. **Submission of educator preparation program data at the Department's request.**

**6A:9A-[3.2]4.2 [Curriculum for teacher] CEAS educator preparation program[s] course requirements**

- (a) The **CEAS educator** preparation program [for all] **designed to lead to** instructional certificates shall include: [the provisions in (a)1 through 5 below. In addition, those candidates seeking the preschool through grade three endorsement shall comply with the requirements in (b) below, and candidates seeking special education endorsements shall comply with requirements in (c), (d), (e) or (f) below.
  1. A minimum of 60 semester credit hours of general education including electives. General education courses shall be distributed among the arts, humanities, mathematics, science, technology and the social sciences. There must be some study in each area. Study in technology may include topics such as educational

technology and tools, the history of technology and the sociological impact of technological advancement which would contribute to the general technological literacy of students. The purpose of general education is to develop the prospective teacher as an educated person rather than to provide professional preparation. This component of the program shall exclude courses that are clearly professional or career and technical in nature;

2. A major in the arts, humanities, social sciences, mathematics, science or technology disciplines;
3. A minimum of 90 credits of the total program distributed among general education and the academic major;]

- [4.] 1. A [sequence of courses] **curriculum** devoted to [professional] **educator** preparation **that builds upon the content knowledge and skills of the individual candidate**[.]; [Study must be devoted to the behavioral/social sciences, the teaching of literacy and numeracy, educating linguistically diverse and special education students, and, effective May 31, 2010, integrating educational technology and tools into the curriculum and classroom. Some of these areas may be included in the professional or liberal arts components of the program consistent with (a)1 above. The professional component of the undergraduate program shall be aligned with the Professional Standards for Teachers as specified in N.J.A.C. 6A:9-3.3 and shall provide students, normally beginning in the sophomore year, with practical experiences in an elementary, middle or secondary school setting. These opportunities shall increase in intensity and duration as the student advances through the program and culminate with a student teaching experience; and

5. A student teaching experience. School districts have a responsibility, as part of the continuum of professional education and development, for accepting and placing student teachers. This shall be the equivalent of a full-time experience of one semester's duration and shall be included within the professional component. The student teacher shall be under the direct and continuous personal supervision of an appropriately certified cooperating teacher. A State-approved Master of Arts in Teaching (MAT) program must ensure that its graduates have completed one of the following:

- i. A student teaching experience through the MAT program;
- ii. A student teaching experience through a State-approved teacher preparation program;
- iii. A standard State instructional certificate; or
- iv. One-year of successful teaching experience under a valid out-of-State license or certificate.]

**2. A clinical component aligned with the Professional Standards for Teachers as specified in N.J.A.C. 6A:9-3.3; and**

**3. Clinical experiences incorporated into courses leading up to and including clinical practice, pursuant to N.J.A.C. 6A:9A-4.4.**

[(b) The preparation program for the Preschool through Grade 3 endorsement also shall include the following:

1. A minimum of 13 semester hour credits of instruction in areas listed in N.J.A.C. 6A:9B-10.1(e). The professional component of the undergraduate program shall, beginning in the sophomore year, provide students with practical experience in a preschool or kindergarten setting and in a first, second or third grade setting. These opportunities shall increase in intensity and duration as the student



advances through the program and culminate with an early childhood education student teaching experience; and

2. The student teaching experience shall be in an early childhood education setting.
- (c) The preparation program for the Students with Disabilities endorsement also shall include the following:
1. A range of 21 to 27 semester hour credits of instruction in areas listed in N.J.A.C. 6A:9B-10.3(e)2. The professional component of the undergraduate program shall, beginning in the sophomore year, provide students with practical experiences in a special education setting. These opportunities shall increase in intensity and duration as the student advances through the program and culminate with a special education student teaching experience; and
  2. The student teaching experience shall include a special education component.
- (d) The preparation program for the Deaf or Hard of Hearing with Oral/Aural Communication endorsement also shall include the following:
1. A range of 21 to 27 semester hour credits of instruction in areas listed in N.J.A.C. 6A:9B-10.3(g)2. The professional component of the undergraduate program shall, beginning in the sophomore year, provide students with practical experiences in a special education setting. These opportunities shall increase in intensity and duration as the student advances through the program and culminate with a special education student teaching experience; and
  2. The student teaching experience shall include a special education component.
- (e) The preparation program for the Blind or Visually Impaired endorsement also shall include the following:
1. A range of 21 to 27 semester hour credits of instruction in areas listed in N.J.A.C. 6A:9B-10.3(f)2. The professional component of the undergraduate program shall,

beginning in the sophomore year, provide students with practical experiences in a special education setting. These opportunities shall increase in intensity and duration as the student advances through the program and culminate with a special education student teaching experience; and

2. The student teaching experience shall include a special education component.
- (f) The preparation program for the Deaf or Hard of Hearing endorsement with sign language also shall include the following:
1. A range of 21 to 27 semester hour credits of instruction in areas listed in N.J.A.C. 6A:9B-10.3(h)2. The professional component of the undergraduate program shall, beginning in the sophomore year, provide students with practical experiences in a special education setting. These opportunities shall increase in intensity and duration as the student advances through the program and culminate with a special education student teaching experience; and
  2. The student teaching experience shall include a special education component.
- (g) Colleges/universities may develop dual certification programs that incorporate the requirements listed in (a) and either (b), (c), (d), (e), or (f) above. Requirements may be completed through integrated study across the curriculum. When appropriate, coursework may serve to fulfill one or more of the curriculum requirements listed in (a) through (f) above. Candidates shall be certified in the both endorsement areas.]

**6A:9A-4.3 Admission to CEAS educator preparation programs**

- (a) **A candidate who starts a CEAS educator preparation program in or after academic year 2015-2016 shall be admitted only if he or she meets the GPA and basic skills requirement in (b) and (d) below.**

- (b) **The average cumulative GPA of the accepted cohort of candidates shall be at least 3.00, when a grade point of 4.00 equals an A grade and the cumulative GPA is earned in an undergraduate level prior to entering a CEAS educator preparation program, except:**
- 1. Each accepted individual candidate shall achieve at least a 2.75 GPA.**
  - 2. A candidate admitted to a program that starts in an academic year prior to 2015-2016, shall maintain for the first two years of college an individual cumulative GPA of at least 2.50 when a grade point of 4.00 equals an A grade.**
- (c) **The candidate for a post-baccalaureate or graduate degree shall hold a bachelor's degree from a regionally accredited college or university, except candidates enrolled in a combined bachelor's and graduate-degree program may be pursuing a bachelor's degree from a regionally accredited college or university.**
- (d) **The candidate shall have achieved a minimum score established by the Department on a Commissioner-approved test of basic reading, writing, and mathematics skills, except:**
- 1. Programs may determine how a candidate admitted to a program that starts before the academic year 2015-2016 is required to demonstrate acceptable levels of proficiency in the use of the English language, both oral and written, and mathematics.**
  - 2. A candidate who starts a program in or after academic year 2015-2016 may demonstrate proficiency in the use of the English language and in mathematics by achieving a minimum score established by the Commissioner on the SAT, ACT, or GRE pursuant to (d)2i below.**

- i. The Department shall maintain on its website a list of qualifying minimum scores for each test, which shall be approximately equal to the top-third percentile score for all test takers in the year the respective test was taken, for each year the data is available.
- ii. A candidate shall qualify for the exception at (d)2 above only if he or she achieves at least the minimum qualifying score posted pursuant to (d)2i above.

**6A:9A-[3.3]4.4 [Supervision of practicum students] Clinical component and candidate supervision for CEAS educator preparation programs**

- (a) CEAS educator preparation programs shall assign to clinical practice candidates in the preparation program who have completed the following minimum clinical experience requirements:
  1. All candidates starting clinical practice in academic year 2018-2019, or thereafter, shall have completed at least 50 hours of clinical experiences in a preschool, elementary, middle, and/or secondary school setting prior to clinical practice.
    - i. For candidates in preparation programs who start clinical practice prior to academic year 2018-2019, programs may determine acceptable levels of teaching proficiency in junior clinical experiences.
  2. The clinical experiences shall:
    - i. Be incorporated into any higher education course taken prior to the start of clinical practice;

- ii. **Include at least two different classroom settings, with at least one in a special education setting, consisting of a classroom where students with IEPs are educated: either an inclusive setting, resource room, or a special classroom; and**
  - iii. **Increase in intensity, or control of the students, and duration as the candidate advances through the program.**
- (b) **For candidates who start clinical practice before academic year 2018-2019, clinical practice shall be one semester.**
- (c) **For candidates starting clinical practice in academic year 2018-2019, or thereafter, clinical practice shall occur:**
  - 1. **During two consecutive semesters, according to the placement school district's schedule, including professional development days with the school district prior to the first day of class for students; and**
  - 2. **At the same school site for the entire experience, if possible. The clinical practice shall include at least 175 hours to occur throughout the first semester and progress to full time by the start of the second semester.**
- (d) **The candidate shall be placed within the endorsement subject he or she will pursue for certification and under the direct and continuous personal supervision of an appropriately certified cooperating teacher.**
- (e) **School districts shall be responsible for accepting and placing clinical interns as part of the continuum of professional education and development.**
- [(a)] (f) [Collegiate faculty assigned to supervise students] **A clinical supervisor shall:**
  - 1. **Have had experience supervising, consulting, or otherwise working in an elementary and/or secondary school in contact with classroom teachers within the previous two years for all instructional certificate programs with the exception of**

the preschool endorsement; for preschool programs, the supervisor shall have had experience supervising, consulting, or otherwise working in an early childhood setting; and

2. Be [full-time faculty members or part-time faculty] **employed by the program or university** with demonstrated expertise in the field [they are] **he or she is** supervising.

[(b)] (g) [Collegiate] **Clinical** supervisors [of student teachers] shall [be] **observe each** assigned [supervisory loads that permit observation of each student] **candidate at least** once every other week **during the candidate's semester of full-time clinical practice.**

[(c)] (h) [District faculty] A **school district cooperating teacher** assigned to [supervise teacher] **guide and direct** candidates shall:

1. Be approved by the [principal and district office] **chief school administrator or his or her designee** with input from the teacher candidate's [preparing institution of higher education] **CEAS educator preparation program;**
2. Have a minimum of three years of teaching experience, including one within the **school** district;
3. Possess a standard instructional certificate;
4. Have appropriate certification that coincides with the area of instruction for which the candidate is being prepared; [and]
5. Be a full-time **school** district faculty member with demonstrated expertise in the field of mentoring/supervision[.]; **and**
6. **Be rated, beginning August 1, 2016, as effective or highly effective on his or her most recently received summative evaluation, pursuant to N.J.A.C.**

**6A:10-4.**

- i. **A cooperating teacher in a school or school district not required pursuant to N.J.A.C. 6A:10-1 to issue summative evaluations shall demonstrate at least one year of effective teaching on his or her most recent evaluation as determined by his or her supervisor.**

[(d)] (i) [District] **School district** cooperating teachers shall:

1. [provide] **Provide** continuous [supervision] **guidance and direction** and weekly conferences to assist [teacher] candidates in professional development[. For purposes of this subsection, “cooperating teacher” means a practicing certified experienced teacher who is assigned responsibility for the instruction, supervision and assessment of teacher candidates during clinical field experiences.]; **and**
2. **Consult the chief school administrator or his or her designee regarding the candidate’s placement; however, the chief school administrator or his or her designee shall make all final placement decisions regarding candidate and cooperating teacher pairings.**

[(e)] (j) [Institutions of higher education preparing teachers] **CEAS educator preparation programs** shall make available to [the] cooperating teachers professional development opportunities and experiences that increase cooperating teachers’ expertise in the field.

**6A:9A-4.5 Recommendations for a certificate of eligibility with advanced standing (CEAS)**

- (a) **CEAS educator preparation programs shall recommend to the Department certification only for candidates who have:**
1. **Completed the CEAS educator preparation program approved pursuant to this chapter;**

2. **Completed all requirements pursuant to N.J.A.C. 6A:9B-8 through 13. Higher education institutions and/or their CEAS educator preparation programs also may apply the exceptions in N.J.A.C. 6A:9B-8.1(a)2i, iii, or iv; and**
  3. **Demonstrated continued competence, aptitude, motivation, and potential for outstanding success in educating students.**
- (b) **CEAS educator preparation programs shall have up to one year from the date the candidate completed the approved program to recommend him or her to the Department for issuance of a certificate.**

**6A:9A-[3.4]4.6 Post-baccalaureate and graduate-level educator preparation programs**

- (a) [A teacher] **An educator** preparation program at a post-baccalaureate or graduate level, [that leads to a recommendation for a CEAS in instructional fields pursuant to N.J.A.C. 6A:9B-8.1 and 10 shall require its students to meet the following requirements:] **including a State-approved Master of Arts in Teaching (MAT), shall meet all of the requirements in this subchapter and in N.J.A.C. 6A:9A-3.**
1. Hold a bachelor's degree from a regionally accredited college or university;
  2. Complete all requirements as described in N.J.A.C. 6A:9B-8.1(a) and (c).  
Colleges and universities are not required to apply exceptions outlined in N.J.A.C. 6A:9B-8.1(a)2i, iii, or iv, but may do so at their discretion;
  3. Present an undergraduate major or 30 semester hour credits in a coherent sequence of courses in the subject teaching field from a regionally accredited college or university. Candidates completing preschool and elementary school teacher preparation programs must present a major in liberal arts, science, dual



content or interdisciplinary academic majors or 60 semester hour credits in liberal arts or science;

4. Demonstrate continued competence, aptitude, motivation and potential for outstanding success in teaching as indicated by assessments of student teaching performance by college and school supervisors. Such assessments shall be communicated to the student and shall be a part of the student's file;
5. Complete a student teaching experience in an early childhood, elementary or secondary setting; and
6. For students who graduate after September 1, 2016, pass a Commissioner-approved performance-based assessment of teaching.]

**(b) A candidate who completes one of the following experiences shall be exempt from the clinical component at N.J.A.C. 6A:9A-4.4:**

1. **A prior clinical practice experience through a CEAS educator preparation program;**
2. **A standard instructional certificate pursuant to N.J.A.C. 6A:9B-8; or**
3. **Demonstrates at least one year of effective teaching under a valid in- or out-of-State license or certificate. The candidate shall provide an original letter documenting completion of at least one year of effective teaching from his or her supervisor(s), principal(s), or employing school district(s) human resources officer.**

#### **SUBCHAPTER 5. CE EDUCATOR PREPARATION PROGRAMS**

##### **6A:9A-5.1 CE educator preparation program implementation**

- (a) CE educator preparation programs shall implement the subchapter's requirements, which shall be:
1. Applied equitably and in a non-discriminatory manner to all candidates, including transfer candidates. All admissions and retention processes shall be consistent with State and provider affirmative action policies and goals; and
  2. Considered minimum educator preparation program requirements. CE educator preparation programs may require candidates to demonstrate higher levels of proficiency or competency for program admission and completion.
- (b) CE educator preparation programs shall develop procedures in compliance with this subchapter. The program procedures and components shall include:
1. Admission to the CE educator preparation program, pursuant to N.J.A.C. 6A:9A-5.2;
  2. A pre-professional component, pursuant to N.J.A.C. 6A:9A-5.3;
  3. Curriculum and coursework requirements, pursuant to N.J.A.C. 6A:9A-5.4;
  4. Completion of the program, pursuant to N.J.A.C. 6A:9A-5.5; and
  5. Submission of educator preparation program data at the Department's request.

**6A:9A-5.2 Admission to CE educator preparation programs**

- (a) A candidate shall be admitted to a CE educator preparation program only if he or she has completed by the start of the program the requirements for a CE, including the endorsement requirements listed in N.J.A.C. 6A:9B-9.

1. **Candidates in programs for documented areas of teacher shortage shall complete the endorsement requirements in N.J.A.C. 6A:9A-5.6.**
- (b) **Any CE educator preparation program enrolling candidates for academic year 2017-2018, or thereafter, shall accept candidates as a cohort. Each candidate within the cohort shall begin the educator preparation program at the same time.**
  1. **CE educator preparation programs enrolling candidates for academic years prior to 2017-2018 shall operate under existing agreements between the Department and the alternate-route educator preparation program or provider.**

**6A:9A-5.3 Pre-professional component for CE educator preparation programs**

- (a) **Effective for candidates starting the CE educator preparation program in academic year 2017-2018, or thereafter, the program shall ensure the candidate completes 50 hours of pre-professional experience, which occurs prior to the candidate's full-time professional teaching experience. The pre-professional experience shall include at least:**
  1. **Fifteen hours in coursework;**
  2. **Twenty hours of clinical experience(s), which shall include at least 10 hours of planning and delivering instruction through an individual or co-teaching model; and**
  3. **Fifteen hours determined by the program that may include, but is not limited to, additional hours of coursework and clinical experience(s).**

- (b) A candidate starting a CE educator preparation program prior to academic year 2017-2018 shall have completed, pursuant to N.J.A.C. 6A:9B-8.3(a)6, at least 24 hours of study prior to the candidate's full-time professional teaching experience.

**6A:9A-5.4 Additional curriculum and course requirements for CE educator preparation programs**

- (a) Effective for candidates starting a CE educator preparation program in academic year 2017-2018, or thereafter, the CE educator preparation program for all instructional certificates shall include:
1. A minimum of 350 formal instructional hours or 24 semester-hour credits, which shall be completed over a minimum of two academic years.
    - i. A CE educator preparation program may accept, at its discretion, up to 100 out of the total 350 formal instruction hours or up to six semester-hour credits from another educator preparation program approved pursuant to N.J.A.C. 6A:9A-3 or 6A:9B-8.2(b);
  2. Curriculum devoted to professional educator preparation that builds upon the content and skills of an individual candidate; and
  3. Curriculum aligned with the Professional Standards for Teachers, pursuant to N.J.A.C. 6A:9-3.3.
- (b) For candidates starting a CE educator preparation program prior to academic year 2017-2018, the CE educator preparation program for all instructional certificates shall meet the requirements of (a)2 and 3 above and shall include a minimum of 200 formal instructional hours or 13 semester-hour credits except:

1. **Candidates who are holders of an elementary school (K-6 and N-8) CE shall complete over two years a minimum of 290 hours of formal instruction or 20 semester-hour credits, which shall include a minimum of 45 hours of study or three semester-hour credits in the teaching of English language arts at the K-6 level and a minimum of 45 hours of study or three semester-hour credits in teaching mathematics at the K-6 level, except if:**
  - i. **The candidates have completed 45 hours of study or three semester hour credits in each area of study as documented by a CE educator preparation program provider or on a transcript from a higher education institution; or**
  - ii. **For each area of study, the candidates document the equivalent of at least one year of successful full-time teaching experience during which the area of study is regularly taught, among the other subjects for which a K-6 teacher would be responsible. The successful full-time teaching experience shall take place within three years prior to receiving the CE. The candidate shall submit to the Office documentation demonstrating completion of the teaching experience.**

**6A:9A-5.5 Completion of CE educator preparation program**

- (a) **To complete a CE educator preparation program, a candidate shall:**
  1. **Complete the minimum hours of instruction, pursuant to N.J.A.C. 6A:9A-5.4; and**
  2. **Effective for candidates who begin a program in academic year 2017-2018, or thereafter, pass a Commissioner-approved performance assessment.**

- (b) A candidate who fails to complete the CE educator preparation program after two years may renew his or her provisional license, pursuant to N.J.A.C. 6A:9B-8.5, and may either remain in his or her current program or apply and be accepted to a new CE educator preparation program.

**6A:9A-5.6 CE educator preparation programs for documented areas of teacher shortage**

- (a) CE educator preparation programs may be developed to serve school districts to place teachers in documented areas of teacher shortage and may be established by New Jersey colleges and universities, educational organizations, or other entities approved by the Commissioner.
- (b) The Commissioner may approve CE educator preparation programs for:
1. Middle school with subject-matter specialization in any documented area of teacher shortage for which an endorsement is available. Each endorsement shall be valid for a teaching assignment area in grades five through eight; or
  2. Preschool through grade 12 in any documented area of teacher shortage for which an endorsement is available.
- (c) The Commissioner may approve CE educator preparation programs that meet all requirements described in N.J.A.C. 6A:9A-3.
1. In addition to the documentation in N.J.A.C. 6A:9A-3.3(b) demonstrating alignment to and compliance with this chapter, programs approved pursuant to this section also shall demonstrate to the Commissioner evidence the program provides content-specific courses and content-based pedagogy that prepare a candidate to teach in the subject that he or she is or will be teaching.

- (d) The Commissioner may approve CE educator preparation programs that meet all requirements in this subchapter.**
- 1. The endorsement requirement within the admission criteria for candidates admitted to the program shall be met in the following ways:**
    - i. Candidates for CE educator preparation programs for documented teacher shortage areas approved pursuant to this section shall complete the content-based subject test but may not complete all course requirements for an endorsement in a shortage area.**
    - ii. In addition to the pre-professional requirements in N.J.A.C. 6A:9A-5.3, candidates shall complete alternative program coursework in lieu of the courses required for an endorsement.**
- (e) Subject-specific coursework hours provided by a preparation program pursuant to this section may be applied to the minimum 50 hours of pre-professional and/or 350 formal instructional hours required pursuant to N.J.A.C. 6A:9A-5.4.**

## POSTSCRIPTUM

● From The Ash and broken *Things* (*Þings*; /θɪŋs/)

Ygg In the home of the gods, lives Yggdrasil, the World  
 d Tree, brace of the Universe, axis of the Nine  
 r Worlds, the terrible steed (*Ygg-drasill*) upon  
 a which Óðinn gallops across the veil dividing  
 s life and death; its leaves dripping of honey-  
 i dew. At its base, three roots stretch to three  
 l distant worlds, uniting the divided. The fi-  
 rst of three roots reaches into Ásgarðr, land  
 of the gods. It delves into Urðarbrunnr,  
 the Well of Urðr, from which fate and time flow pierces into Jötun-  
 the second stretches into  
 Níflheimr, land  
 of mist, and pulls  
 from the ancient Hver-  
 gelmir, the bubbling  
 spring. It is gnawed  
 upon by the ser-  
 pent Níðhoggr,  
 the honor devour  
 -er, consumer of  
 the wicked and  
 unworthy, and  
 herald of Rag-  
 n. is not without Well of dip from the  
 cost; when the All- father, Óðinn, desired to  
 father, Óðinn, desired to light of the gods.



### L'Animal Écrivain que donc je suis (à suivre).<sup>14</sup>

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<sup>14</sup> The ~~Animal~~ Writer that therefore I am. Mirroring the titling of Derrida's (*ap.* 6) auto-deconstruction *l'animal que donc je suis*, this phrase can similarly be interpreted as "the writer that therefore I am," "the writer that therefore I follow," as well as "the writer that therefore I am (more to follow)." As astutely noted by McCullough (*ap.* 11), such phrasing raises problematic ambiguity, while simultaneously questioning whether "these can be the same '~~animal~~ [writer]'"? Can I follow the ~~animal~~ [writer] that I am?" (p. 54), and what or who follows after?

McCullough is careful to note that "We cannot say Derrida is 'seen naked in his bathroom by his pet cat' (though, of course, many scholars report just that [e.g., Grady, *ap.* 11; Koosed, *ap.* 14]), for it is the specific gaze of "*this* cat" that begins the "wave upon wave of deconstructive reflection that follow" (p. 54). The effect of the non-human, non-divine gaze, according to McCullough, is what catalyzes the questioning of the "other," which quickly (d)evolves into an inquiry into the "biblical, theological, and cultural layers of 'being seen' 'naked' by the 'gaze of an other' who is now, this moment, more truly other than any other: 'wholly other, like every other that is every (bit) other found in such intolerable proximity that I do not feel as yet justified or qualified to call it my fellow, even less my brother'" (Derrida, *ap.* 6, p. 12). In some ways, this suggests that the catalyst is not being seen by another, but in seeing oneself being seen by an Other.

In this momentary *I and Thou*[*Ich und Du*]-esque encounter (cf. Buber, *av.* 63), Derrida notes of his cat that "nothing can ever rob me of the certainty that what we have here is an existence that refuses to be conceptualized" (p. 9), an ashamedness not of one's nakedness, but of one's shame (McCullough, *ap.* 11). In this knowledge, it becomes possible to view the vast, yawning chasm of difference between the ambiguity presented by Derrida's cat (*ap.* 6) and the ambiguity presented by Schrödinger's (*av.* 65), though both present aporetically (Derrida's as a causal aporia, Schrödinger's as a quantum aporia).

Both Derrida's and Schrödinger's cats in some way require/prompt (re)action to (re)solve a situation that, without awareness essentially does not exist and requires action. A difference, however, is that for Schrödinger's cat, the question isn't as to its origin, but to its position, whereas for Derrida's cat, the question is whether his nakedness preceded its viewing by the very other, Other, or was a consequence therefrom, resulting from catalyzed self-via-Other awareness and the deconstruction that accompanies such a perspective.

Attention to deconstruction of text involves similar un-/multiple certain(y/ies) about position(ality), origin(ality), and direction(ality). Lawlor comments that when writing aporias "he most resembles a cat pacing back and forth before a door, waiting to be let out or let in" (*ap.* 7, p. 91), to which Oliver adds "we [ourselves] are all waiting to be let out or to be let in, as are all the animals" (*ap.* 9, p. 113). In each instance, the certitude with which we approach certainty is called into question and decentralized; the inability to come to a definitive answer as to the existential state of something as seemingly concrete as to the state of a cat, or to the extent to which human nakedness precedes or follows gaze, or whether one is or follows after those that came before, are central tensions in both the phrasing and text of *l'animal que donc je suis*.

Drawing attention to the possibility of uncertainty or to the arbitrary construction of normalcy does not typically come without resistance. This pushback creates a liminal space between the uncertain and those who have become "un-certained" by having their certainty challenged—those who ascribe to a given view of what is certain and normal, who suddenly find themselves viewing another, while perhaps not noticing that they have simultaneously themselves become an Other. Derrida experienced such a response when he

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suggested the primacy of text over speech, a stance that set him apart from many preeminent scholars at the time, notably Saussure.

Questioning a writer's ability to write *meaning* (as compared to the ability to write *text*), also provides an entry point from which to examine aporetic notions of authority, primacy, and (one's own) certainty. Adopting the view that meaning cannot be written *in texts*, but rather is written *onto text* through reading destabilizes typical notions of the power dynamic and primacy of the writerly author and of the readerly other. In such a relationship, the reader possess or shares the authority traditionally inherent in the writerly notion of "author" (reflected in the etymological connection between authority and author reflects).

According to Derrida, as a part of interaction with "the other, I submit to the law of giving reason(s), I share a virtually universalizable medium, I divide my authority [...] The paradox—always the same—is that sovereignty is incompatible with universality even as it is appealed to by every concept of international, and thus universal or universalizable—and thus democratic—law" (*ap.* 5, p. 101). From this perspective on writing, the seemingly sovereign authority of the author is deconstructed in the necessity for universality (or the universalizable) in communication, which redistributes authority to the reader, who in reading, effectively "writes" the text.

On the surface, this echoes Derrida's belief that the exercise of power necessarily accompanies its communication, which similarly requires its division, which he applies as much to the author-reader power relationship as to the tensions between sovereignty and democracy. Yet, we must resist the urge to consider these things (power, authority, democracy, sovereignty, State, citizen, language, text, reader, author, etc.) causally or inherently linked simply because everyday language makes them appear to be so. As Blanchot (*av.* 5) notes,

Everyday language calls a cat a cat, as if the living cat and its name were identical, as if it were not true that when we name the cat, we retain nothing of it but its absence, what it is not. Yet for a moment everyday language is right, in that even if the word excludes the existence of what it designates, it still refers to it through the thing's nonexistence, which has become its essence. To name the cat is, if you like, to make it into a non-cat, a cat that has ceased to exist, has ceased to be a living cat, but this does not mean that one is making it into a dog, or even a non-dog. (p. 325)

Understanding the (re/un-[or perhaps super-])positioning of the roles, relationships, and influence of the reader/writer dichotomy is crucial to critiques with roots in deconstruction. McCullough notes that it is, however, insufficient to "be shamed, stripped naked, reformed and transformed... to be regenerated as a human animal still only beginning to understand what it does not know, does not sufficiently *take care* to know as unknown" (McCullough, *ap.* 11, p. 57, emphasis in original), for it is only in this state of unclothedness of mind, from a position of being "exposed absolutely" (McCullough, p. 58) that we ourselves may be deconstructed.

Derrida's overarching emphasis on nudity resonates with the call to metaphorically "strip bare" our constructed understandings, so that we may begin to understand anew. This deconstructive gaze, like that of Baudelaire's *Chat*, is one "*Profond et froid, coup et fend comme un dard*" (profound and cold, [which] cuts and cleaves like a dart) leaving all before it unmasked (*av.* 18, p. 217). In this way deconstruction does not signal an end to rationality, but its uncluttered (re)birth—a process of (re)renewal, in which we return both as the animals that therefore we are, and the animals that therefore we follow. Correspondingly, this section both points to and continues my ongoing attempt to continue, enact, and

“Take a look for yourself,’ he said, handing me a big brick of tattered paper.

‘But be careful,’ he added in a conspiratorial whisper. ‘It’ll change your life.’

Here’s what the title page said: House of Leaves” [sic]. (Truant, *av.* 2, p. 513)

I would like to begin this ending at the beginning, returning briefly to, albeit here for the first time, to where I started this journey—at an ending.<sup>15</sup> I entered into teacher education analysis coming off the heels of a program in Reading, Writing, and Literacy,

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deconstruct the literary, philosophical, and discursive traditions that preceded, accompany, and refute this text.

While this text serves multiple purposes and a variety of possible audiences (both overt and implied), as I suppose do most, I approached the (de)construction of this text as “dissertation” with the same implied alogological silence of the audience as Derrida ascribed to the gaze of his cat. Though sporadically broken by the intermittent moments during which I share a Levi-Straussian “wink with a cat” (*av.* 39) in conversation with my committee, this silence, the silence of the unspoken tribunal, is largely “inaccessible, however real and near” (McCullough, *ap.* 11, p. 57). McCullough goes so far as to suggest “that the power of this silence parallels the power of the silence of Jesus before his accusers,” a silence that allows us to “hear” because it is “saturated with the unspeakable pathos for the hearer with ears to hear, hearing what one can of an other who deploys no logos, no apology, no defense, no veils” (p. 57).

Like Derrida’s humanity, which relied upon the dehumanization prompted by the alogological gaze of a specific non-human other (*that* cat) to in order to “rehumanize [himself] in a more embracing and compassionate, and enlightened relation to the complex heterogeneity of all life” (McCullough, *ap.* 11, p. 57), it is in the reflected alogological gaze of the authority-bearing, text-writing, yet essentially silent other that I may better see *the writer that therefore I am, the writer that therefore I follow*, and, in tacitly hopeful fulfillment of Eliot’s (*av.* 61, p. 58) question as to how one “would address a Cat,” a hint at *the writer that therefore I am (more to follow)*.

<sup>15</sup> Beginnings and endings were somewhat of a point of interest for Derrida. His juxtaposing of notions of beginnings and endings, however, hint at a crucial interstitial moment, the borderlands—*la frontera* (Anzaldúa, *av.* 13)—what Bruns called a “border crossing: the anomalous space-between in which no one is anything, neither human nor nonhuman but inhuman or ahuman—perhaps we could say ‘prehuman’ or (as many now say) ‘posthuman’: anyway, without horizons or signposts of any kind” (*ap.* 11, p. 86). Derrida once commented, “In the beginning was the post, and will never get over it. But in the end I know it, I become aware of it as of our death sentence: it was composed, according to all possible codes and genders and languages, as a declaration of love (*av.* 13, p. 29)

This notion, and indeed this discussion, exists in the space between end and beginning, primed “like a child ready for the apocalypse, [*it is*] (*following*) *the apocalypse itself*, that is to say, the ultimate and first event of the end, the unveiling and the verdict. [*It is*] (*following*) it, the apocalypse, [*it identifies*] with it by running behind it, after it” (Derrida, *ap.* 2, p. 12, emphasis and parentheses original [save those that bound this citation], brackets added).

the influences of which can be traced throughout my own ontological approaches to understanding and unpacking the world. That program exposed me to strand of pedagogical and philosophical inquiry that reverberate throughout this document: How and why do (or should) we approach education? In what ways do we participate in writing and reading the world into existence? Whose voices are included in such conversation? How did we arrive at where we (think we) are, and do we wish to proceed in the same manner?

The program's overt attention to reading, writing, text, discourse, and thought blended with an underlying expectation that we, as students, exit the program prepared to enter into academic spaces and to continue such inquiries. Moreover, I believe that we were expected, in our own ways, to change the world. However, the prospect of changing the world was not, as it appeared to me, to be a reflection of doctoral study, or of publishing a field-altering dissertation. Rather, it seemed that the emphasis fell on changing our approaches to understanding, expressing, and evaluating the world as we (believed we) understood it.

For the first time, I was exposed to ways of thinking and representing thinking that I had never encountered— *différance*, *gouvernementalité*, *conscientização*, *heteroglossia*, *polyphony*—concepts, terms, and ways of thinking that I needed, but lacked. Not having encountered them, however, had not kept me from yearning for them throughout my life. These ways of reading the world had, from even my early experiences, been marked by the presence of absence— nearly imperceptible and always ineffable; a noticeably empty space wherein nothing had before resided.

The strange had become familiar. Once exposed to those concepts, like old friends just met, my life and, perhaps unfortunately, the world, were unable to return to a time when those ways of seeing (and what was seen) were unknown. Like a child who, to his horror, upon inspection found that there indeed existed monsters beneath the bed, there was no returning to a place of hopeful denial or blissful ignorance of those views.<sup>16</sup> My options were to deny what I had seen, to shut it away and never again acknowledge or admit its impossible existence, or to tumble down the rabbit hole,<sup>17</sup> to race down the expanding and shifting corridors of the 5 ½ minute hallway, to both glimpse the emperor in his nudity and, like Adam in his shame, to notice my own.<sup>18</sup>

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<sup>16</sup> When confronted with new awareness of my own prevailing unawareness that rolled in steadily, unnoticed, and menacingly, like Sandburg's Fog "on little cat feet" (*av.* 84), I was forced, like Buber (*av.* 30) to stare into that approaching cat's eyes and, in trembling voice ask, "can it be that you mean me? Do you actually want that I should not merely do tricks for you?" (p. 145).

Somewhat interestingly, Nietzsche makes a strikingly similar comment to Sandburg's statement, claiming in *Thus spoke Zarathustra* that "It is the stillest words which bring the storm. Thoughts that come with doves' footsteps guide the world," which supposedly compensates for one "[lacking] the lion's voice for commanding" (*ap.* 10, p. 119). This exchange between characters follows a similar process of intellectual destabilization and subsequent mockery for the new awareness such dissonance afforded, which is positioned as being prerequisite to—and demanding of—subsequent shepherding of others onto the new path:

They mocked me when I found and walked in my own path; and certainly did my feet then tremble. And thus did they speak to me: you forgot the path before, now do you also forget how to walk!" Then was there again spoken to me without voice: "What matter about their mockery! You are one who have unlearned to obey: now shall you command!" [...] you must yet become a child, and be without shame." (Nietzsche, *ap.* 10, pp. 118-119)

Focused largely on notions of power and the importance of overcoming the self, this section of *Zarathustra* speaks to destruction and overcoming of the self, iterative departure from the known, and cyclical isolation from and creation of reason and understanding.

<sup>17</sup> Derrida (*ap.* 2) once remarked, "Although I don't have time to do so, I would of course have liked to inscribe my whole talk within a reading of Lewis Carroll. In fact you can't be certain that I am not doing that, for better or for worse, silently, unconsciously, or without your knowing" (pp. 376-377). Similarly, only logistical, performative, and structural limitations, coupled with my own artistic and writerly shortcomings, have prevented me from presenting the entirety of this dissertation study within a reading of Lewis Carroll, *perhaps*.

At the same time, the familiar had become strange. Things that used to make sense, the comfortable myths in which we wrap our histories and the familiar lies in which we cloak ourselves became confused; they warped and distorted, cracked, chipped, and flaked like the thin, cheaply painted façades on the old family homes down south where I laughed and played as child. They fell away, like my own idyllic ignorance upon realization that the “back houses” of my aunts’ and uncles’ homes, the little edifices where I built forts and memories were, in fact, former slaves quarters, with memories and histories all their own—a revelation that turned my favorite childhood memories to ash and cinder.

By discussing these revelations, I in no way intend to imply that I am more knowledgeable, let alone better off. On the contrary, they have brought me to one of the worst places in which I can imagine existing, superseded in its displeasure perhaps only by the place I was prior. For me, writing in “experimental modes,” as Laurel Richardson calls them, is not an exercise. Similarly, deconstruction, as a manner of thinking, reading, and writing, isn’t for me an analytical tool or a frame with which I can bound my work or limit a study, nor is it, as some have alleged/accused, (“merely”) a space for intellectual play or a concretization of ego; it is a way to cope.

Throughout this dissertation, I have attempted to weave together a few theoretical, conceptual, and historical strands that, in their own times and contexts, to

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<sup>18</sup> I have since waffled between Alice’s frustration that she simply shouldn’t have mentioned Dinah because “Nobody seems to like her, down here, and I’m sure she’s the best cat in the world” to the seemingly accurate, but largely unhelpful, Cestrian “we’re all mad here. I’m mad. You’re mad,” to the Burtonian adaptation’s cinematic Cheshire Cat’s belief that “I’m not crazy, my reality is just different than yours.”

differing degrees and from different perspectives have each experienced resistance, deconstruction, in particular, seems to have provoked the sharpest rebuke. Derrida himself was accused of being self-serving, nihilistic, and solipsistic (Schermer, *ap.* 14), of attempting to destroy the academy, reality, and knowledge (see Brown, *ap.* 17; Tallis, *ap.* 14), and more, somewhat far-flung accusations, such as his responsibility for the creation and rise of Donald Trump (Kelly, *ap.* 16). Chomsky, in a now deleted blog comment (still, at the time of this writing, accessible via the Wayback Machine), went so far as to state,

I thought I ought to at least be able to understand [Derrida's] Grammatology, so tried to read it. I could make out some of it, for example, the critical analysis of classical texts that I knew very well and had written about years before. I found the scholarship appalling, based on pathetic misreading; and the argument, such as it was, failed to come close to the kinds of standards I've been familiar with since virtually childhood. (*av.* 5, n.p.)

For me, deconstruction and its intentional “inclusion” in this document serve as a way to pause, unpack, back up, and (re)consider. In this sense, “deconstruction” is not, as has been claimed, about destroying rationality, complexity, reality, and functionality; on the contrary, it aims at destroying the structures, governmentalities, and enculturations that make us unable to recognize the irrationality, over-simplicity, artificiality, and unworkability that exist unnoticed within our dominant ways of thinking. In my reading, deconstruction lacks the elitism (Huffer, *ap.* 6), obscurantism (Searle, *a.* H.L.), and esotericism (Armour, *ap.* 10) that some have claimed it reflects; indeed, with so

little held as sacred, including its own presumptions and assertions, such accusations rest on shaky ground.

My inclusion of and comments on Aarseth's (*av.* 3) notion of ergodic literature, was in no way intended to be a signal that my goal was to create an ergodic, labyrinthine, difficult, or intentionally challenging text. Instead, my goal was to offer a text that presented itself in such a way that readers might have space to consider what internalized structures, ways of knowing, and unnoticed worldviews create other "non-ergodic" texts to be straight-forward, trivially-traversed, and pre-digested for immediate consumption, and what about our ways of thinking lead us to understand that as preferable.

My interest and investment in such ways of writing predate my encountering of Aarseth's conceptions and my own graduate or even collegiate study, however it was during my graduate coursework that I encountered Mark Danielewski's *House of Leaves*, a text which has haunted<sup>19</sup> me since I encountered it as the first assigned reading

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<sup>19</sup> Interestingly, some negative reviews on goodreads.com seem to hinge their displeasure with *House of Leaves* or Danielewski on the book's primary classification being "horror." For example, goodreads.com user Jacquie Vonhunnus, posed the question:

Why does everyone find [House] of Leaves so scary? "I thought this book was fascinating, psychologically insightful and disturbing, and written in a fantastically innovative way. But frightening? Not in the least. People say it gave them nightmares. About what? Honestly curious. (*av.* 13, n.p.)

For me, the horror of *House of Leaves* stems not from the *content* "in" the text of the book itself, but in the Danielewski's successful elicitation of *discontent* in my subsequent reading of the world. In a similar way, Goodreads.com user "Archer" noted that they did find the text "disturbing and unsettling" but that it was

[M]ore like existential horror and not, you know, typical monster-under-your-bed stuff. I think this novel really captures the feeling of irrationality, the absence of answers and reason. It makes you feel, at least for a while, that the world is ultimately chaotic and incomprehensible. (Archer, *av.* 13, n.p.)



in my first doctoral course. As an introduction to a program on reading, writing, and literacy, the text was an incredibly effective tool of destabilization of preconception and expectation. My classmates and I discussed how the text shook us. *House of Leaves* dispelled with the certainty of many assumptions that we had cultivated throughout our academic careers: that reading and writing makes sense, follows rules, and reflects logic; that novels follow a known progression that are predictable and reliable, even if the content of the story is unknown; that, as readers, you progress along the same path as another who has also read the text; and so on.

For some, it called into question aspects of their own stories around which they had grafted and grown their identities: that their ability to “write well” or “read well” reflected their intelligence, which in turn threatened aspects of their sense of self. *House of Leaves* stripped and flagellated the emperors to whom most had pledged their fealty, not in a mocking way, but nonetheless in a way that delegitimized the currency that most of us had used to purchase our own titles: test scores, reading comprehension or writing

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Similarly, another user “Donald,” commented that the book was not, as he put it, “Freddy Kruger scary. Insane asylum with locked doors and no personnel scary;” instead, the “weird freekin’ [*sic*] book” cultivates “Something oily and rather putrid that you can’t wash off. A taunting presence on the shelf or nightstand. Less giving me nightmares than it gave me daymares” (Donald, *av.* 13, n.p.).

The comments made by Archer and Donald fall somewhere close to the sense that I got when reading *House of Leaves* for the first time, and for the multiple first times that I have read it since. The book offers a vantage from which it is possible to catch a glimpse of unnoticed and unnamed irrationalities, to attend to the absence of reason (or presence of non-reason). Such glimpses offer ingredients (but not necessarily requirements or even instructions) for the cultivation of a paralyzing re-viewing of the world, that, like Donald, left me with a lingering impression of dripping with a heavy glazing of ooze (I could not tell you, in that moment or this, whether the sensation read as amniotic or La Brean, let alone if such a distinction would be necessary or appropriate).

abilities, and successes in schooling that stemmed from being able to get “right answers” about authorial intent, or symbolism, or meaning.

In response, most rejected the text and the glimpse into the world that it created. Or, even if briefly, they stood in awe at the accomplishment, like patrons in a gallery snapping cell phone pictures of a Degas or a Klimt, before walking away and returning to their lives mostly unchanged. I and a few others, however, were unable to step back into the world that existed before we had been forced to peer beyond the veil. We were too stubborn, prideful, or perhaps stupid to simply let go of the book, the style, or the underlying message. It became insufferable to pretend that kayfabe had not been broken, or to return to the comforting embrace of the Orwellian doublespeak that had us loudly asserting that  $2+2=5$ <sup>20; 21</sup> because it allowed us to be ahead by one without

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<sup>20</sup> Since you are here, I feel I can assume that you did not interpret this notation to mean that  $2+2=5^{18}$  ( $\approx 3.8146973e+12$ ), which, due to overlap in notational conventions, would have been a “reasonable” interpretation. Such a reading would, perhaps, have constituted a “more extreme” illustration of Orwell’s  $2+2=5$ , though perhaps not.

<sup>21</sup> *Star Trek: The Next Generation* re-presented Orwell’s concept in an interesting and noteworthy manner. In the two-part episode “Chain of Command” (av. 8), Jean-Luc Picard, captain of the starship *Enterprise*, participates on a covert seek and destroy mission targeting Cardassian biological weapons. The weapons, however, were non-existent, serving as fictional bait for a very real trip in which Picard finds himself ensnared.

Following his apprehension, Picard is subjected to a variety of forms of physical and psychological torture at the hand of the Cardassian, Gul Madred. In an effort to break him, the gul then shows Picard four lights, which are plainly visible to both Picard and the television viewer. Madred then asks the captain how many lights he there are. Gul Madred repeatedly states that there are not four lights, but five, and he delivers excruciatingly painful shocks to Picard each time that he refuses to agree.

After multiple sessions of this exercise, Gul Madred lies to the now visibly beleaguered and exhausted Picard, stating that the *Enterprise* had been destroyed and there was no remaining hope of rescue. He then offers Picard a choice: he could spend the remainder of his life in solitary confinement while being subjected to increased torment or death; alternately, he could live out his days on Cardassia, not only free but in ease and comfort as well. The gul notes that he would greatly prefer the captain choose the latter,

confronting the privilege, hypocrisy, and inequality inherent in our refusal to admit what, at our core, was an unshakable truth—that much of what we clung to as real, important, logical, and necessary was no more valid than that which we decried as unreal, unimportant, illogical, or unnecessary.

For me, Danielewski's text, in its non-conformity, did not try to stand out, it merely stood, but in doing so called out the suffocating conformity with which others bound themselves, hand, foot, and mind.<sup>22</sup> Like Derrida's works, it was subjected to

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noting that he would enjoy debating with Picard, praising him for his "keen mind." Picard asks what he must do, to which the gul replies, "nothing really, tell me how many lights you see."

As he is contemplating his answer, the camera zooms in tight on a confused looking Picard as he gazes up toward the lights; the gul can be heard repeating his question with increasing urgency, "how many lights? This is your last chance, the guards are coming. Don't be a stubborn fool. How many?" However, Captain Picard is unable to render reply, as at that moment another Cardassian gul, Lemec, enters the cell, interrupting the process, unmasking Gul Madred's lie, and revealing that Picard is to be cleaned up and released. During the brief exchange between Guls Lemec and Madred, Picard is shown squinting at and contemplating the lights. Before exiting, aware that he is about to walk to his freedom, Picard faces Gul Madred and shouts in a horse staccato, "THERE. ARE. *FOUR*. LIGHTS!" Gul Madred is shown with a slight smile, perhaps suggesting a degree of respect for Picard's refusal to be broken.

In the closing moments of the episode arc, while speaking privately with the ship's counselor, who had just finished reading his official report, Picard admits that his release was secured just in time. He states that he omitted Gul Madred's offer of a life of comfort or more torture from his official report. Picard notes, "all I had to do was say that I could see five lights, when in fact, there were only four." The counselor comments/asks, "you didn't say it(?)," which the captain confirms. However, Picard then reveals that even though he did not say it (that there were five lights), he was going to and that he would have told him (Gul Madred) anything, "anything at all." In a hushed and seemingly worried tone, Picard whispers, "but more than that, I believed that I could see five lights."

<sup>22</sup> As noted by Albert Einstein "a man must work hard for people to remember him. A cat does it easily. He has only to appear and his presence remains for years on rainy days" (n.d., as cited in Hallépée, *ap.* 11, p. 60). In its existence as a textual artifact, House of Leaves merely *is*, in the same way that Derrida's assertions merely *are*. In some ways, to see, as many do, tricks, games, or insults in such things is to peer, not into the texts, but into the mind of the respondent. Consequently, it seems, the writer's intentions become suspect, as though they had intentionally created a situation in which readers would feel frustration, boredom, or embarrassment. Though ultimately worth it, such rebukes leave me frustrated as well, like the chevalier who finds himself a scratched, bitten lout, despite providing "cakes for the cat," as it were (Dumas, *av.* 103).

criticisms that labeled it as “full of game” and a “scholastic, footnoted, typographical fun house” (Kelly, *a. H.L.*). Another reviewer noted,

There are footnotes on practically every page and some of the footnotes have footnotes of their own. The footnotes often continue over multiple pages. So at some points you have to decide either to read the main narrative and go back to the footnotes or to read the whole footnote and go back to the main narrative.

This makes reading a mentally exhausting project. (Book Worm, *ap.* 16)

However, that particular review overlooks the readerly choices, interstitial texts, and strands of possibility and intertextuality that are woven into every piece of writing. Like Derrida’s assertion that there are no outside texts, Danielewski’s approach to enjambment of multiple, overlapping texts (presented without the familiar boundaries that artificially suggest separation between texts, such as citations, allegorical references, or parentheses, which I have used here to denote an in-line, [“para-”]textual aside) makes it difficult for the reader to retain their belief in the “realness” of boundaries we construct (or to rely on such constructions to help them). For example, as the reviewer noted, *House of Leaves* goes to an extreme to provide opportunities for the reader to notice their power to decide whether to continue on with the main narrative or to follow a citation or footnote, but such opportunities exist in (perhaps all) other texts as well, though we have learned and been taught to forget their presence.

*Unione, Sfumato, Chiaroscuro, and Cangiante.* Bearing the preceding in mind, the question becomes, how to write in ways that fail to betray this position, which was in

some ways not new, per se, but rather, unforgotten<sup>23</sup> and relearned. How do we (re)trace a line largely erased, scribbled out, or relegated to the margin?

Though there exists a long and successful history of outside-of-the-box thinkers and writers who have pushed and continue to transcend the boundaries of what text is and can be, I came into this work through the work of Laurel Richardson. Richardson ponders these questions in *Fields of Play: Constructing an Academic Life* (av. 3), a text to which this dissertation has been greatly shaped and is deeply indebted. In *Fields*, Richardson poses a range of important questions about so-called *experimental* forms of writing. She asks about such things as whether or not non-traditional modes ought to be reserved for those with academic sinecure, whether “the tenured [do] a disservice to students by introducing them to alternative forms of writing?” (av. 3, p. 93). However, before tackling the ethical implications of teaching students to write in these ways (and/or not teaching them to *not* write in those ways), she asks a crucial question: “Whither and whence?” (p. 93).

Importantly, she notes that “a postmodernist consciousness gives greater freedom to present texts in a variety of forms to diverse audiences,” however she cautions “[t]he greater freedom to experiment with textual form, moreover, does not guarantee a better product” (Richardson, av. 3, p. 93). It is insufficient to write in unusual ways simply

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<sup>23</sup> “We do not always remember the things that do no credit to us. We justify them, cover them in bright lies or with the thick dust of forgetfulness. All of the things that Shadow had done in his life of which he was not proud, all the things he wished he had done otherwise or left undone, came at him then in a swirling storm of guilt and regret and shame, and he had nowhere to hide from them. He was as naked and as open as a corpse on a table, and dark Anubis the jackal god was his prosecutor and his prosecutor and his persecutor.” (*American Gods*, ap. 1)

because one can—a more meaningful approach is to write in ways that are both *on purpose* and *with purpose*. In light of her question about whither and whence, yet without attempting to provide a declarative answer or to create a standard by which non-traditional texts might be weighed, she offers four thoughts:

1. There is no right way to stage a text;
2. Writing is a process of discovery;
3. Writing practices can help writers relate more deeply and complexly to their material; and
4. That experimental writing is a harbinger of paradigm changes (Richardson, *av.* 3).

Since it is not my purpose to unpack each of these assertions (with which I largely agree), I will synthesize my thoughts on the first, third, and fourth as they relate to this dissertation and to the (flawed, yet whole) product that I produced,<sup>24</sup> citing examples from the construction of this dissertation to illustrate points raised.

In relation to the first, primarily pragmatic, point, Richardson invokes Agger, (*av.* 11), whom she paraphrases, stating that “even radical messages can be published in conservative journals if the writer follows the rules” (Richardson, *av.* 3, p. 93). Here, Richardson offers a vision for the atypical in service to the typical—non-traditional structures that serve to better equip the writer to understand and produce the traditional.

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<sup>24</sup> “I think I would rather be a man than a god. We don’t need anyone to believe in us. We just keep going anyhow. It’s what we do.” (*American Gods*, *ap.* 1)

She comments that non-traditional approaches need not be ends unto themselves, but that “deconstructing traditional writing practices is a way of making writers more conscious of writing conventions and, therefore, more competently able to meet them and to get their messages into main stream social science” (*av.* 3, p. 93).

On the surface, I agree with that assertion; in fact, I personally agree that deconstruction has the potential to bring the writer into greater focus and clarity of that which has been previously constructed than, perhaps, is possible by replication or extension of what has already been built alone.<sup>25</sup> I would, however, extend the point Richardson makes by suggesting that writing in non-traditional ways not only advantages writers, who gain a deeper understanding of common structures through their use of uncommon ones, but there is also meaningful benefit for those who encounter non-traditional texts, because they are asked (by various degrees of force) to confront their expectations and their constructed senses of what is or isn't (good, reasonable, correct, academic, etc.) writing, and to ask, must it be<sup>26</sup> so?

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<sup>25</sup> “Hey,’ said Shadow. ‘Huginn or Muninn, or whoever you are.’ The bird turned, head tipped, suspiciously, on one side, and it stared at him with bright eyes. ‘Say 'Nevermore,’ said Shadow. ‘Fuck you,’ said the raven.” (*American Gods, ap.* 1)

<sup>26</sup> “People believe, thought Shadow. It's what people do. They believe, and then they do not take responsibility for their beliefs; they conjure things, and do not trust the conjuration. People populate the darkness; with ghosts, with gods, with electrons, with tales. People imagine, and people believe; and it is that rock solid belief that makes things happen.” (*American Gods, ap.* 1)

*Cross words.* Simply noting “that doesn’t belong here”<sup>27</sup> when reading a dissertation and encountering, for example, a crossword puzzle where, perhaps, a glossary “ought to be” (see Appendix, p. 171), opens up space in which it is possible to notice one’s own (pre)conceptions about what is right or wrong, normal or abnormal, and so on. I elected to incorporate a crossword puzzle, which “does not fit” with most people’s conception of dissertation writing, not because it is fun or inherently un-(or anti-)structured, but because the structure of a dissertation has been constructed in such a way that it includes the presence of the absence of a crossword. Crossword puzzles are indeed highly structured and, like dissertations, are “logical” and “coherent” forms of text (within the confines of the assumptions that support them), replete with their own rules, syntax, grammar, conventions, histories, and appearance. If both “traditional” dissertations and crossword puzzles have and follow rules, as well as hold and convey meaning, why then would they be incompatible?<sup>28</sup> Why might the presence of one within the context of the other seem so instantly jarring?

Consequently, my purpose in including a crossword in this dissertation was not for the purpose of intellectual “play” or simply to push the envelope. Also, like Richardson, my comments on the crossword are not intended to assert, defend, or provide a definitive answer about its appropriacy or effectiveness. The intent, whether or

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<sup>27</sup> “He wondered whether home was a thing that happened to a place after a while, or if it was something that you found in the end, if you simply walked and waited and willed it long enough.” (*American Gods*, ap. 1)

<sup>28</sup> “This isn’t about what is ... it’s about what people think is. It’s all imaginary anyway. That’s why it’s important. People only fight over imaginary things.” (*American Gods*, ap. 1)



not successful, was to help (re)call the constructed nature of what is—to disentangle notions of purported clarity, efficiency, normality, and purpose from the structures that serve as (variably effective) proxies for those concepts. In creating the crossword that appears in the Appendix, I was forced to attend to and uphold a variety of structures (e.g., rotational symmetry, graphical planarity, and textual intersectionality) which do not typically enter into consideration for a dissertation. Parallel considerations pervade dissertation planning (e.g., chapter order, citation style, etc.) with what appears at first to be little overt overlap.

This apparently mutual exclusivity of consideration and presentation, however, is perhaps one more reflective of the mental structures of those viewing such texts, not necessarily born of the texts themselves.<sup>29</sup> As previously noted, it is not as though crossword puzzles are not included in dissertation writing because they are inherently unstructured, it is more so that the structure of crossword puzzles has been largely *written out(side)* of the construction of what a dissertation includes. Including a crossword, then, becomes an opportunity not only to point out that dissertations do not include them, or to thumb one’s nose at their dis-inclusion by purposefully including one, but also a chance to more meaningfully consider what structures have been included and ask whether or not we wish to proceed in the same manner. In other words,

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<sup>29</sup> “All we have to believe with is our senses, the tools we use to perceive the world: our sight, our touch, our memory. If they lie to us, then nothing can be trusted. And even if we do not believe, then still we cannot travel in any other way than the road our senses show us; and we must walk that road to the end.” (*American Gods*, ap. 1)

including a crossword is neither intended to mock dissertation writing, nor is it intended to pose an argument about the validity or value of doing so; it is intended to facilitate noticing, prompt questioning, and to create space for dialogue about the inevitability of that which is typically unquestioned in its completeness, integrity, and necessity.<sup>30</sup>

Returning briefly to Richardson (*av.* 3), as well as to Foucault and to Derrida, this vision for writing (particularly enacted in non-traditional ways) does indeed function as a “harbinger” (p. 93) of sorts. Yet unlike Heimdall’s sounding of the Gjallarhorn, “alternative” forms of writing herald no great clash in which the gods of our own understanding do battle and die between the old (implicitly presumed to be inferior) and new (presumed to be superior).<sup>31</sup> Though, perhaps some may see it as preferable, the trumpets blown by alternative ways of writing sound no death knell (cf. *Glas*, Derrida, *av.* 26) for the traditional dissertation or novel, for “grand theory,” governmentalities, or mythical mindsets, and they offer no clear path forward.<sup>32</sup>

Instead, these ways of writing-knowing offer us the opportunity to resist, even momentarily, the “unspecified assumptions that hinder us in our search for understanding ‘truly’” (Richardson, *av.* 3, p. 95). They allow us to attend to *becoming*—

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<sup>30</sup> “What should I believe?” thought Shadow, and the voice came back to him from somewhere deep beneath the world, in a bass rumble: Believe everything.” (*American Gods*, *ap.* 1)

<sup>31</sup> “There are new gods growing in America, clinging to growing knots of belief: gods of credit card and freeway, of Internet and telephone, of radio and hospital and television, gods of plastic and of beeper and of neon. Proud gods, fat and foolish creatures, puffed up with their own newness and importance. “They are aware of us, they fear us, and they hate us,” said Odin. “You are fooling yourselves if you believe otherwise.” (*American Gods*, *ap.* 1)

<sup>32</sup> “When people tell you there’s something wrong with a story, they’re almost always right. When they tell what it is that’s wrong and how it can be fixed, they’re almost always wrong.” (*American Gods*, *ap.* 1)

to the decortication of why we do what we do, and the unpacking of “what what [we] do does” (M. Foucault, personal communication, as cited in Dreyfus & Rabinow, *av.* 18, p. 187). They provide us the opportunity to sufficiently unbuild our understandings so that we might explore if, indeed, disadjustment is the necessary “condition of justice” (Derrida, *av.* 6, p. 27).

### HC SVNT DRACONES.

On poetry: A rhapsody  
(Swift, *av.* 277/157)  
All human race would fain be wits,  
And millions miss for one that hits.  
Young's universal passion, pride,  
Was never known to spread so wide.  
Say, Britain, could you ever boast  
Three poets in an age at most?  
Our chilling climate hardly bears  
A sprig of bays in fifty years;  
While every fool his claim alleges,  
As if it grew in common hedges.  
What reason can there be assign'd  
For this perverseness in the mind?  
Brutes find out where their talents lie:  
A bear will not attempt to fly;  
A founder'd horse will oft debate,  
Before he tries a five-barr'd gate;  
A dog by instinct turns aside,  
Who sees the ditch too deep and wide.  
But man we find the only creature  
Who, led by Folly, combats Nature;  
Who, when she loudly cries, Forbear,  
With obstinacy fixes there;  
And, where his genius least inclines,  
Absurdly bends his whole designs.

“Thus in the second volume there is a really remarkable tirade about Milton’s Eve: as an eloquent rhapsody we can scarcely admire it too much; but to be asked to believe that it was uttered in a quiet conversation between two young ladies, destroys half our pleasure. Let the reader judge for himself. [...] ‘Milton’s Eve! Milton’s Eve! I repeat. [...] Milton was great; but was he good? His brain was right; how was his heart? He saw Heaven; he looked down on Hell. He saw Satan, and Sin his daughter, and Death

their horrible offspring. Angels serried before him their battalions: the long lines of adamantine shields flashed back on his blind eyeballs the unutterable daylight of heaven. Devils gathered their legions in his sight, —their dim, discrowned, and tarnished armies passed rank and file before him. Milton tried, too, to see the first woman; but [...] he saw her not.’ [...] ‘I would beg to remind him that the first men of the earth were Titans, and that Eve was their mother! From her sprang Saturn, Hyperion, Oceanus, —she bore

Not empire to the rising sun  
 By valour, conduct, fortune won;  
 Not highest wisdom in debates,  
 For framing laws to govern states;  
 Not skill in sciences profound  
 So large to grasp the circle round,  
 Such heavenly influence require,  
 As how to strike the Muse's lyre.

Not beggar's brat on bulk begot;  
 Not bastard of a pedler Scot;  
 Not boy brought up to cleaning shoes,  
 The spawn of Bridewell or the stews;  
 Not infants dropp'd, the spurious pledges  
 Of gipsies litter'd under hedges;  
 Are so disqualified by fate  
 To rise in church, or law, or state,  
 As he whom Phoebus in his ire  
 Has blasted with poetic fire.  
 What hope of custom in the fair,  
 While not a soul demands your ware?

Where you have nothing to produce  
 For private life, or public use?  
 Court, city, country, want you not;  
 You cannot bribe, betray, or plot.  
 For poets, law makes no provision;  
 The wealthy have you in derision:  
 Of state affairs you cannot smatter;  
 Are awkward when you try to flatter;  
 Your portion, taking Britain round,  
 Was just one annual hundred pound;  
 Now not so much as in remainder,  
 Since Cibber brought in an attainder;  
 For ever fix'd by right divine  
 (A monarch's right) on Grub Street line.

Poor starv'ling bard, how small thy gains!  
 How unproportion'd to thy pains!  
 And here a simile comes pat in:  
 Though chickens take a month to fatten,  
 The guests in less than half an hour  
 Will more than half a score devour.  
 So, after toiling twenty days  
 To earn a stock of pence and praise,  
 Thy labours, grown the critic's prey,  
 Are swallow'd o'er a dish of tea;  
 Gone to be never heard of more,  
 Gone where the chickens went before.  
 How shall a new attempter learn  
 Of different spirits to discern,  
 And how distinguish which is which,  
 The poet's vein, or scribbling itch?  
 Then hear an old experienced sinner,  
 Instructing thus a young beginner.

Prometheus.' [...] 'I say, there were giants on the earth in those days, —giants that strove to scale heaven!'" (Brontë, *av.* 150, pp. 166-167).

In my Social Studies and the Arts course this semester, students are contemplating how best to enact their roles as future teachers, who will likely be responsible for teaching “history” as presented in elementary school textbooks, tests, and (often pre-packaged, mandatory) curricula. Throughout the course, students are each tasked with considering how they might navigate potential dangers that accompany teaching history in ways that do not always align with popular understandings of how the United State of America came to be—the mythological and constructed histories of our nation.

While some students viewed this as potentially controversial, others did not. For context, they were asked to think about potential pedagogical, personal, and social ramifications they might encounter in various teaching situations. For example, they considered: how might they

Consult yourself; and if you find  
 A powerful impulse urge your mind,  
 Impartial judge within your breast  
 What subject you can manage best;  
 Whether your genius most inclines  
 To satire, praise, or humorous lines,  
 To elegies in mournful tone,  
 Or prologue sent from hand unknown.  
 Then, rising with Aurora's light,  
 The Muse invoked, sit down to write;  
 Blot out, correct, insert, refine,  
 Enlarge, diminish, interline;  
 Be mindful, when invention fails,  
 To scratch your head, and bite your nails.

Your poem finish'd, next your care  
 Is needful to transcribe it fair.  
 In modern wit all printed trash is  
 Set off with numerous breaks and dashes.

To statesmen would you give a wipe,  
 You print it in Italic type.  
 When letters are in vulgar shapes,  
 'Tis ten to one the wit escapes:  
 But, when in capitals express'd,  
 The dullest reader smokes the jest:  
 Or else perhaps he may invent  
 A better than the poet meant;  
 As learned commentators view  
 In Homer more than Homer knew.

Your poem in its modish dress,  
 Correctly fitted for the press,  
 Convey by penny-post to Lintot,  
 But let no friend alive look into't.  
 If Lintot thinks 'twill quit the cost,  
 You need not fear your labour lost:  
 And how agreeably surprised  
 Are you to see it advertised!  
 The hawker shows you one in print,  
 As fresh as farthings from the mint:  
 The product of your toil and sweating;  
 A bastard of your own begetting.

Be sure at Will's, the following day,  
 Lie snug, and hear what critics say;  
 And, if you find the general vogue  
 Pronounces you a stupid rogue,  
 Damns all your thoughts as low and little,  
 Sit still, and swallow down your spittle;  
 Be silent as a politician,  
 For talking may beget suspicion;  
 Or praise the judgment of the town,  
 And help yourself to run it down.  
 Give up your fond paternal pride,  
 Nor argue on the weaker side:  
 For, poems read without a name  
 We justly praise, or justly blame;

choose to talk (or not talk) about Christopher  
 Columbus, his deeds, goals, and influence with  
 fifth graders?; how (or if) would they describe the  
 “peculiar institution” of slavery during Black  
 History Month to students in preschool?; why do  
 we as a nation (re)tell the story of Betsy Ross and  
 the creation of the American Flag?; and so on.

The students were armed with (or perhaps  
 disarmed by) Loewen's *Lies my teacher told me:  
 Everything your American history textbook got  
 wrong* (av. 5), which presented information that  
 directly opposed many of their existing  
 understandings of history, fact, and the certainty of  
 the present view of the past. For some, this was the  
 first time they themselves were forced with  
 confronting how they would reconcile or process  
 histories and stories that contradict, confound,  
 confuse, and silence one another, rather than being  
 told by some authority how to do so. Without  
 naming it as such, the students were engaging in an  
 inquiry into the ramifications of teaching history  
 from texts with potentially unreliable narrators.

They were also implicitly entering into an intellectual space in which they could consider whether they as teachers (or I as the course instructor) did/would/should function as (potentially) unreliable narrators (re)telling the grand narrative of (the United

And critics have no partial views,  
 Except they know whom they abuse:  
 And since you ne'er provoke their spite,  
 Depend upon't their judgment's right.  
 But if you blab, you are undone:  
 Consider what a risk you run:  
 You lose your credit all at once;  
 The town will mark you for a dunce;  
 The vilest dogg'rel Grub Street sends,  
 Will pass for yours with foes and friends;  
 And you must bear the whole disgrace,  
 Till some fresh blockhead takes your place.

Your secret kept, your poem sunk,  
 And sent in quires to line a trunk,  
 If still you be disposed to rhyme,  
 Go try your hand a second time.  
 Again you fail: yet Safe's the word;  
 Take courage and attempt a third.  
 But first with care employ your thoughts  
 Where critics mark'd your former faults;  
 The trivial turns, the borrow'd wit,  
 The similes that nothing fit;  
 The cant which every fool repeats,  
 Town jests and coffeehouse conceits,  
 Descriptions tedious, flat, and dry,  
 And introduced the Lord knows why:  
 Or where we find your fury set  
 Against the harmless alphabet;  
 On A's and B's your malice vent,  
 While readers wonder whom you meant:  
 A public or a private robber,  
 A statesman, or a South Sea jobber;  
 A prelate, who no God believes;  
 A parliament, or den of thieves;  
 A pickpurse at the bar or bench,  
 A duchess, or a suburb wench:  
 Or oft, when epithets you link,  
 In gaping lines to fill a chink;  
 Like stepping-stones, to save a stride,  
 In streets where kennels are too wide;  
 Or like a heel-piece, to support  
 A cripple with one foot too short;  
 Or like a bridge, that joins a marish  
 To moorlands of a different parish.  
 So have I seen ill-coupled hounds  
 Drag different ways in miry grounds.  
 So geographers, in Afric maps,  
 With savage pictures fill their gaps,  
 And o'er unhabitable downs  
 Place elephants for want of towns.

States of) America's (mythical) (hi)story.

I found the students' comments in these moments of disequilibrium revealing—some of them felt that they had been lied to by their teachers and/or by society for the purpose of building “patriotism;” many felt as though they were better off now that they knew the “real” story (a notion that I gently pushed back upon); most were unsure of how to proceed; nearly all hoped, expected, or requested that I tell them the “right” answer. Perhaps unfortunately for them (though perhaps not), I was not going to supply them with “the answer” to their task, or to the broader question(s) of what is real, true, and right. I had no more definitive answer to those questions than they—yet even if I did, supplying any solid answer would be, by virtue of position, to adopt

the same “godlike tone” that textbooks employ in such a way “it never occurs to most students to question them” (Loewen, *av.* 5, p. 16).

This is not to say that I was silent on the subject. I, like Loewen (*av.* 5), believe that “[t]he antidote to feel-good history is not feel-bad history but honest and inclusive history” (p. 97) and see that honesty and inclusivity as a goal. Unlike Loewen (*av.* 5), I am disinclined to offer, even ironically or jokingly, the “truth about”<sup>33</sup> historical events (e.g., several chapters follow the pattern shown here: “Chapter 3: The truth about the First Thanksgiving”), or about the present-day ideologies that flow from and feed back into the reasons why we cling to some mythical stories.

While discussing and questioning how best to approach these topics in the students’ future classrooms, I do not see the shepherding of the students toward my own views, answers,

But, though you miss your third essay,  
 You need not throw your pen away.  
 Lay now aside all thoughts of fame,  
 To spring more profitable game.  
 From party merit seek support;  
 The vilest verse thrives best at court.  
 And may you ever have the luck  
 To rhyme almost as ill as Duck;  
 And, though you never learn'd to scan verse  
 Come out with some lampoon on D'Anvers.  
 A pamphlet in Sir Bob's defence  
 Will never fail to bring in pence:  
 Nor be concern'd about the sale,  
 He pays his workmen on the nail.  
 Display the blessings of the nation,  
 And praise the whole administration.  
 Extol the bench of bishops round,  
 Who at them rail, bid ---- confound;  
 To bishop-haters answer thus:  
 (The only logic used by us)  
 What though they don't believe in ----  
 Deny them Protestants--thou lyeest.  
  
 A prince, the moment he is crown'd,  
 Inherits every virtue round,  
 As emblems of the sovereign power,  
 Like other baubles in the Tower;  
 Is generous, valiant, just, and wise,  
 And so continues till he dies:  
 His humble senate this professes,  
 In all their speeches, votes, addresses.  
 But once you fix him in a tomb,  
 His virtues fade, his vices bloom;  
 And each perfection, wrong imputed,  
 Is fully at his death confuted.  
 The loads of poems in his praise,  
 Ascending, make one funeral blaze:  
 His panegyrics then are ceased,  
 He grows a tyrant, dunce, or beast.  
 As soon as you can hear his knell,  
 This god on earth turns devil in hell:  
 And lo! his ministers of state,  
 Transform'd to imps, his levee wait;  
 Where in the scenes of endless woe,  
 They ply their former arts below;  
 And as they sail in Charon's boat,  
 Contrive to bribe the judge's vote;  
 To Cerberus they give a sop,  
 His triple barking mouth to stop;  
 Or, in the ivory gate of dreams,  
 Project excise and South-Sea schemes;  
 Or hire their party pamphleteers  
 To set Elysium by the ears.

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<sup>33</sup> Similarly, instances of writerly tone suggest that Loewen, at least in part, is offering a version of history that is “more authoritative” and “real” than that presented in American history textbooks (a stance with which I do not necessarily disagree, but with which I am nonetheless reluctant to adopt).

understandings, or beliefs as my purpose or goal.<sup>34</sup> Consequently, in most instances I am quite reluctant to offer them definitive answers about where I think they should go, what I think they should do, what I think matters, or what I see as the “real” “truth.”<sup>35</sup> At the same time, I actively try to resist teaching in ways that would suggest that there exists an(y) empirically-correct answer of where to go, what to do, what matters, or what is the “real” “truth,” even if those answers are unrelated to my understandings and beliefs.

Instead, I see my work in that class, and as well this dissertation, in relation to

<p>Then, poet, if you mean to thrive, Employ your muse on kings alive; With prudence gathering up a cluster Of all the virtues you can muster, Which, form'd into a garland sweet, Lay humbly at your monarch's feet: Who, as the odours reach his throne, Will smile, and think them all his own; For law and gospel both determine All virtues lodge in royal ermine: I mean the oracles of both, Who shall depose it upon oath. Your garland, in the following reign, Change but the names, will do again.</p>	<p>But, if you think this trade too base, (Which seldom is the dunce's case) Put on the critic's brow, and sit At Will's, the puny judge of wit. A nod, a shrug, a scornful smile, With caution used, may serve a while. Proceed no further in your part, Before you learn the terms of art; For you can never be too far gone In all our modern critics' jargon: Then talk with more authentic face Of unities, in time and place: Get scraps of Horace from your friends, And have them at your fingers' ends;</p>	<p>the goals of providing space in which the familiar can be re- examined and found to be strange, and the strange can be seen in</p>
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ways that reveal aspects of the familiar that have always been present, even if unnoticed.

In this way, I seek not to substitute their previous monopolar understandings for newer ones with no more dimensionality than the old, but rather to help them to approach their practice from a more situated, complex, and critical view.

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<sup>34</sup> It is not as though I believe my views as *unimportant* or *unworthy* of discussion, it is perhaps more accurate to suggest that I do not consider them any *more important* or *more worthy*, particularly in light of the reality that they will be the professionals who must decide how to proceed in their classrooms.

<sup>35</sup> I do this despite feeling as though this often results in student frustration and discomfort. While I intentionally strive to maintain and cultivate an environment of psychological safety for the students in my class, I do not attempt to enact similar affordances regarding their intellectual comfort, since I believe that learning often requires departure from spaces of comfort.



For me, teaching, reading, and writing in non-(a-, and anti-)typical ways work toward the “solution<sup>36</sup> of the teacher-student contradiction” in the “banking” concept in education (Freire, *av.* 30b, p. 73). Freire notes that model “maintains and even stimulates the [teacher-student] contradiction through [...] attitudes and practices, which mirror oppressive society as a whole” (p. 73); it encourages and reproduces structures that render non-authority individuals (students, readers, citizens) as “manageable beings” (p.73). The more the oppressed can be convinced that the task of education is to successfully acquiring the valuables of the authority-bearing other (e.g., teacher, writer, rulers), “the less they develop the critical consciousness which would result from their intervention in the world as transformers of that world” (Freire, *av.* 30b, p. 73) and the more easily they may be controlled.

Resisting pressure (from myself; tradition; my students, readers; etc.) to suggest or give answers, or to make straight the pathway to “right answers” (whether I create, provide, transmit, or repeat them), reflects my desire to seek to destabilize the notion that I as teacher (or writer) am the sole possessor of value and knowledge, solely

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<sup>36</sup> Freire (*av.* 30b) states that “This solution [to the teacher-student contradiction] is not (nor can it be) found in the banking concept” (p. 73, parenthetical in original). I would argue that what Freire seeks here is not *solution* or even *resolution*, but *dissolution*. Freire positions this “solution” as the first task of libertarian education—in relation to its *raison d’être* of reconciliation—is to “[reconcile] the poles of contradiction so that both are simultaneously teachers *and* students” (p. 72, emphasis in original).

That passage helps to lay the foundation for Freire’s views on constructivist education, yet I would argue that seeking “solution” to the (pseudo-)dichotomy between teacher and students in order to more-meaningfully construct a liberated form of education without attention to deconstruction and dissolution may be susceptible to the very same threats of reproduction of (internalized) oppression against which Freire (*av.* 30b) himself warns. The urge to resolve inequalities (rather than to dissolve the aporetic ways of understanding and approaching the world that support, seemingly justify, and rationalize such inequalities) could thus be seen as another “attempt to liberate the oppressed with the instruments of domestication” (Freire, *av.* 30b, p. 52).

responsible for their accuracy and care. Similarly, I struggle with/against the notion that I should strive to ensure that others “successfully” “receive” (my) knowledge, in place of awareness of their own beliefs and the choice, autonomy, and responsibility to decide for themselves in community with their fellow citizens of the world how best to proceed.

Freire suggests the banking model relies upon education being a process in which “valuable” knowledge is passed from authorities to the non-authorities, who are then responsible for adopting and caring for the values of the oppressor. I would, however, add something to the framing of this transfer as primarily one-way, moving from oppressor to oppressed. He notes that in the banking model, “the teacher confuses the authority of knowledge with his or her own professional authority, which she and he sets in opposition to the freedom of the students” (p. 73). According to Freire (*av.* 30b), libertarian education engages in *conscientization* in part by noticing and resisting the relationship between oppressive authority and freedom, which also weakens this mono-directional framing. Freire implicitly suggests that a valuable two-way exchange is occurring. The oppressor offers something of value (e.g., knowledge, behaviors, roles, and ways of knowing deemed acceptable to the dominant society). In exchange for the currency of the dominant, the oppressed offer up things of great value: their humanity, individuality, creative power, voice, awareness of logical inconsistencies or contradictions, curiosity, ability to see multiple or no answers to questions, and so on. Allowing, even implicitly, the valuable offerings of the oppressed to the oppressor for (any) access to the knowledge, ways of being, and structures of the oppressor to be invisible in the educational transaction also serves to support the oppressor.

<p>Learn Aristotle's rules by rote, And at all hazards boldly quote; Judicious Rymer oft review, Wise Dennis, and profound Bossu. Read all the prefaces of Dryden, For these our critics much confide in; Though merely writ at first for filling, To raise the volume's price a shilling.</p>	<p>It is not enough to value the de- valued, which</p>	<p>Bavius in Wapping gains renown, And Maeuius reigns o'er Kentish town: Tigellius placed in Phooebus' car From Ludgate shines to Temple-bar: Harmonious Cibber entertains The court with annual birth-day strains; Whence Gay was banish'd in disgrace; Where Pope will never show his face; Where Young must torture his invention To flatter knaves or lose his pension.</p>
<p>A forward critic often dupes us With sham quotations <i>peri hupsous</i>: And if we have not read Longinus, Will magisterially outshine us. Then, lest with Greek he overrun ye, Procure the book for love or money, Translated from Boileau's translation, And quote quotation on quotation.</p>	<p>inverts (or reverts to) oppression; we must notice how/ where structures</p>	<p>But these are not a thousandth part Of jobbers in the poet's art, Attending each his proper station, And all in due subordination, Through every alley to be found, In garrets high, or under ground; And when they join their pericranies, Out skips a book of miscellanies. Hobbes clearly proves, that every creature</p>
<p>At Will's you hear a poem read, Where Battus from the table head, Reclining on his elbow-chair, Gives judgment with decisive air; To whom the tribe of circling wits As to an oracle submits. He gives directions to the town, To cry it up, or run it down; Like courtiers, when they send a note, Instructing members how to vote. He sets the stamp of bad and good, Though not a word be understood. Your lesson learn'd, you'll be secure To get the name of connoisseur: And, when your merits once are known,</p>	<p>deconstruct them- selves and fight the call and urge to treat on the terms of the oppressor,</p>	<p>Lives in a state of war by nature. The greater for the smaller watch, But meddle seldom with their match. A whale of moderate size will draw A shoal of herrings down his maw; A fox with geese his belly crams; A wolf destroys a thousand lambs; But search among the rhyming race, The brave are worried by the base. If on Parnassus' top you sit, You rarely bite, are always bit: Each poet of inferior size On you shall rail and criticise, And strive to tear you limb from limb; While others do as much for him.</p>
<p>Procure disciples of your own. For poets (you can never want 'em) Spread through Augusta Trinobantum, Computing by their pecks of coals, Amount to just nine thousand souls: These o'er their proper districts govern, Of wit and humour judges sovereign. In every street a city bard Rules, like an alderman, his ward; His undisputed rights extend Through all the lane, from end to end; The neighbours round admire his shrewdness For songs of loyalty and lewdness; Outdone by none in rhyming well, Although he never learn'd to spell.</p>	<p>which is to support oppression. We must create/renew structures and rules of/for dialogue and education that</p>	<p>The vermin only teaze and pinch Their foes superior by an inch. So, naturalists observe, a flea Has smaller fleas that on him prey; And these have smaller still to bite 'em, And so proceed ad infinitum. Thus every poet, in his kind, Is bit by him that comes behind: Who, though too little to be seen, Can teaze, and gall, and give the spleen; Call dunces, fools, and sons of whores, Lay Grub Street at each other's doors; Extol the Greek and Roman masters, And curse our modern poetasters; Complain, as many an ancient bard did, How genius is no more rewarded; How wrong a taste prevails among us; How much our ancestors outsung us: Can personate an awkward scorn For those who are not poets born; And all their brother dunces lash, Who crowd the press with hourly trash.</p>
<p>Two bordering wits contend for glory; And one is Whig, and one is Tory: And this, for epics claims the bays, And that, for elegiac lays: Some famed for numbers soft and smooth, By lovers spoke in Punch's booth; And some as justly fame extols For lofty lines in Smithfield drolls.</p>	<p>reject the question- answer, problem- solution dyads of the oppressor.</p>	

O Grub Street! How do I bemoan thee,  
Whose graceless children scorn to own thee!  
    Their filial piety forgot,  
    Deny their country, like a Scot;  
    Though by their idiom and grimace,  
    They soon betray their native place:  
    Yet thou hast greater cause to be  
    Ashamed of them, than they of thee,  
    Degenerate from their ancient brood  
    Since first the court allow'd them food.

    Remains a difficulty still,  
    To purchase fame by writing ill.  
From Flecknoe down to Howard's time,  
How few have reach'd the low sublime!  
    For when our high-born Howard died,  
    Blackmore alone his place supplied:  
    And lest a chasm should intervene,  
When death had finish'd Blackmore's reign,  
    The leaden crown devolved to thee,  
    Great poet of the "Hollow Tree."  
    But ah! How unsecure thy throne!  
A thousand bards thy right disown:  
    They plot to turn, in factious zeal,  
    Duncenia to a common weal:  
    And with rebellious arms pretend  
    An equal privilege to descend.

    In bulk there are not more degrees  
    From elephants to mites in cheese,  
    Than what a curious eye may trace  
    In creatures of the rhyming race.  
From bad to worse, and worse they fall:  
    But who can reach the worst of all?  
For though, in nature, depth and height  
    Are equally held infinite:  
    In poetry, the height we know;  
    'Tis only infinite below.  
For instance: when you rashly think,  
    No rhymers can like Welsted sink,  
    His merits balanced, you shall find  
    The Laureate leaves him far behind.  
    Concanen, more aspiring bard,  
    Soars downward deeper by a yard.  
Smart Jemmy Moore with vigour drops;  
    The rest pursue as thick as hops:  
With heads to point the gulf they enter,  
    Link'd perpendicular to the centre;  
    And as their heels elated rise,  
    Their heads attempt the nether skies.

    O, what indignity and shame,  
    To prostitute the Muses' name!  
By flattering kings, whom Heaven design'd  
    The plagues and scourges of mankind;  
    Bred up in ignorance and sloth,  
    And every vice that nurses both.

In our efforts to work toward justice and dialogue, we all benefit from the collective knowledge, wisdom, and efforts of those who have come before. These giants, upon whose shoulders the dwarves of our own understandings perch so they may see farther than the giants themselves, have offered up methods by which it is possible to enact libertarian and liberating modes of thinking, acting, teaching, and engaging with one another in (hopefully) increasingly dialogic and non-oppressive ways. Their efforts have carved out paths that we may follow along, build upon, and, when necessary or helpful, deviate from, as we seek just ways of writing our identities, institutions, professions, and actions onto the text of the world.

*Writing the world onto the text of a dissertation*

I attempted to write this dissertation in a way that honored many concepts and stances: poststructuralist ways of knowing, writing, and approaching policy critiques; libertarian

perspectives on teaching, teacher education and social justice; belief in the value of and responsibilities inherent to democratic self-governance; and strong commitment to the autonomy and situated knowledge of the teaching and teacher education professions.

In this endeavor, I was guided by many who came before who helped me to better understand *why* I might undertake a study in this way, but it was not until I encountered Bacchi and Goodwin's (*ap.* 16) WPR methodology that I had a sense for *how* to go about doing so. The WPR method laid out a previously-trod path that helped me to enact this poststructuralist policy critique. I valued the lack of definitiveness with which the WPR approached and considered its own findings. In the WPR's seventh step, the researcher is prompted to apply the same careful analytic questioning to her/his/their own assumptions as they do to the policy documents that they critique. This aligned with the poststructuralist, anti-/post-positivist assumptions that were informed by my

Perhaps you say, Augustus shines,  
Immortal made in Virgil's lines,  
And Horace brought the tuneful quire,  
To sing his virtues on the lyre;  
Without reproach for flattery, true,  
Because their praises were his due.  
For in those ages kings, we find,  
Were animals of human kind.  
But now, go search all Europe round  
Among the savage monsters —  
With vice polluting every throne,  
(I mean all thrones except our own;)  
In vain you make the strictest view  
To find a — in all the crew,  
With whom a footman out of place  
Would not conceive a high disgrace,  
A burning shame, a crying sin,  
To take his morning's cup of gin.

Thus all are destined to obey  
Some beast of burthen or of prey.

'Tis sung, Prometheus, forming man,  
Through all the brutal species ran,  
Each proper quality to find  
Adapted to a human mind;  
A mingled mass of good and bad,  
The best and worst that could be had;  
Then from a clay of mixture base  
He shaped a — to rule the race,  
Endow'd with gifts from every brute  
That best the — nature suit.  
Thus think on — s: the name denotes  
Hogs, asses, wolves, baboons, and goats.  
To represent in figure just,  
Sloth, folly, rapine, mischief, lust;  
Oh! were they all but Neb-cadnezers,  
What herds of — s would turn to grazers!

Fair Britain, in thy monarch blest,  
Whose virtues bear the strictest test;  
Whom never faction could bespatter,  
Nor minister nor poet flatter;  
What justice in rewarding merit!  
What magnanimity of spirit!  
What lineaments divine we trace  
Through all his figure, mien, and face!  
Though peace with olive binds his hands,  
Confess'd the conquering hero stands.  
Hydaspes, Indus, and the Ganges,  
Dread from his hand impending changes.  
From him the Tartar and Chinese,  
Short by the knees, entreat for peace.  
The consort of his throne and bed,  
A perfect goddess born and bred,  
Appointed sovereign judge to sit  
On learning, eloquence, and wit.  
Our eldest hope, divine Iuelus,  
(Late, very late, O may he rule us!)

own readings of Foucault. What I most appreciated about this step was that it helped avoid some of the pitfalls ascribed to poststructural analysis. In particular, the WPR method is designed to help researchers and policy scholars to avoid pitfalls, such as tendencies to present poststructural critiques as somehow “smarter” or better informed than the policy being analyzed, to levy objections at conditions or terms of a particular policy rather than the imposition of policy itself, to fall short of making meaningful recommendations, to create (the illusion of) certainty during an attempt to critique certainty, or to position analyses as somehow “true” while simultaneously undermining the very notions upon which assertions of truth are built.

For me, the WPR method did an excellent job at assisting me in working through the first few of those concerns, but even with the guidance offered by the WRP method, I personally struggled with the last. For me, simply “[applying the] list of questions to [my] own problem representations,” as suggested by the WRP approach’s step seven was susceptible to structuralist conventions because it seemed to eventually end up at a declarative representing of the *real* problem. According to Bacchi and Goodwin (*ap.* 16), “The last ‘step’ in the WPR approach is an undertaking to apply its six questions to one’s *own* proposals and problem representations” (p. 24) and is intended to account for reflexivity vis-a-vis “what we are ourselves” (Foucault, *ap.* 1, as cited in Bacchi & Goodwin, *ap.* 16, p. 24). Bacchi and Goodwin state that this is intended to offer a way to “subject our own thinking to critical scrutiny” and to demonstrate a “commitment to self-problematization... given one’s location within historically and culturally entrenched forms of knowledge” (p. 24), and I implicitly agree with those goals.

What I found as I attempted to apply the seventh step WPR method, however, was that I eventually fell into a recursion—an inescapable and unbroken cycle of answering and interrogating, offering representations and then questioning them. Likely stemming from my own inexpert attempt to enact this methodology, I was unsure how to proceed from this cycle, nor was I sure how best to represent it in terms of a more traditional dissertation format. What I found was that the only way that I could escape the never-ending cycle of questioning and offering, creating and then undermining, was to bring deconstructionist conceptions into conversation with the Foucauldian poststructuralist assumptions leveraged by Bacchi and Goodwin.

While initially reading about the WPR method, I found it odd that Bacchi and Goodwin seemingly offered Derrida and deconstruction such a wide berth.<sup>37</sup> While I can speculate as to the purpose behind this stance, from my perspective, much of the description and enactment of the WPR method seemed to dance around deconstruction without mentioning it—a portrait of Derrida’s seminal work painted in the negative space, a specter conspicuously present in its absence. Whereas remaining solely in the poststructuralist domain of critiquing that which is and considering that which could be left me unsure of how to break the cycle of questioning without offering a “final” (and implicitly “correct”) answer as to where I landed, deconstruction allowed me an exit, a

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<sup>37</sup> Deconstruction exists only tangentially in the titles of two cited pieces of work, while Derrida appears only as the editor of another cited work. Neither appear in Bacchi and Goodwin’s text devoted to the rationale behind and enactment of the WPR method. They do, however, speak to similar concepts, such as “unmaking,” yet they do so without reference to deconstruction.

way to sit with and to represent the complexity in a meaningful way (and in a way that would let me finish this dissertation) without betraying the work.

I attempted to represent this recursion in the “Chapter Four” section that focused on subjectivity. Unlike the preceding sections, in which I more willingly created and used similarly “real” and “certain” objects as those I was critiquing (i.e., I was no more critical of monolithic notions of “the profession,” or “the State” than the policy), in that section I tried to represent the way in which it was necessary to cut off the cycle somewhere. Moreover, I attempted to represent the interrelationship and intertwining of that process of questioning with one’s own identity, their own subjectivity. In the section that follows, which focuses on rationality, I leaned more “fully” on deconstructionist methods (erasure in particular) to hint at my own hunch that it was not necessarily important to add more text in order to come to new understandings, and that deconstructing that which exists is also a way to question and critique.<sup>38</sup>

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<sup>38</sup> Furthermore, applying erasure to a text already *sous rature* (previously done by the NJ Department of Education) was for me a way to call attention to the way in which cycles of destruction and creation stand in place of/in opposition to improvement. Much akin to the way in which animation relies upon the continuous cycle of creation and destruction of images to present the illusion of movement, I feel that the revision and reform offered by policy changes often masquerade as progress.

This seemingly aligns with Goodlad’s overarching notions of reform and renewal, in which reform relies upon the cycle of production and destruction that implies development (“higher” standards, “better” measures, etc.)—new as (poor, but implied) proxy for superior). In contrast, Goodlad’s notion of renewal takes a more deconstructivist approach. Rather than simply reforming, (re)making by destroying and beginning anew, renewal implies a pausing, backing up, and (re)considering whether the steps taken are still heading toward a meaningful objective that is aligned with the professional and ethical considerations at play in any given situation. Unlike reform’s focus on destruction of the present and replacing it with the (presumably, but not necessarily better) “new” (as visible in the replacing of institutions’ methods of evaluating candidates with the edTPA or Praxis examinations), renewal requires unbuilding and rebuilding, consideration of whether that which is done still serves, and careful deliberation about how to proceed, what to continue, what to add, and where (if at all) deviation occurred...



Locating the split between the section on objectivity (which adhered more closely to the WPR approach) and the section on rationality (which utilized more overtly deconstructionist techniques), in part reflects a shift in my thinking from merely enacting the WPR approach to adding to it. That said, even though this diverges from the WPR method as described, I am not certain that my addition of more deconstruction-based methods represents a deviation from the WPR approach as intended. Indeed, I feel that this blended methodology, as well as the resulting somewhat “deconstructed” dissertation, *are* my enactment of the seventh step of the WPR method. In other words, I found myself unable to bind my critique of assumptions to only those within the focal policy; enacting the WPR approach also prompted a questioning of the assumptions inherent in the teacher education profession’s reliance upon the “traditional” dissertation format as a (purportedly) meaningful gatekeeping device that (supposedly) effectively conveys the thinking of the field (why else would we do it?).

This unfolding and intentionally auto-deconstructing dissertation is my attempt to represent what happens when an interrogative lens is turned on the assumptions inherent in the dissertation process (including traditional notions of methods, formats, layouts, ways of building credibility, etc.). While I am and have been predisposed to this

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...Perhaps most importantly, it is important to attend to the notion that reform comes from the outside, while renewal happens from within. In this way, it becomes possible to see all policy impositions as elements of destruction within teacher education that delete, subvert, and undermine the professionalism and autonomy of the field. In contrast, renewal involves (only) the stakeholders in teacher education positioned as meaningful members of the profession of teacher education: teacher education faculty, faculty in the arts and sciences, and school partners. In such a vision, governmental outsiders are just that—outsiders to the work, who lack the grounds upon which to lodge constraint, directives, or requirements.

What early manhood has he shown,  
 Before his downy beard was grown,  
 Then think, what wonders will be done  
 By going on as he begun,  
 An heir for Britain to secure  
 As long as sun and moon endure.

The remnant of the royal blood  
 Comes pouring on me like a flood.  
 Bright goddesses, in number five;  
 Duke William, sweetest prince alive.  
 Now sing the minister of state,  
 Who shines alone without a mate.  
 Observe with what majestic port  
 This Atlas stands to prop the court:  
 Intent the public debts to pay,  
 Like prudent Fabius, by delay.  
 Thou great vicegerent of the king,  
 Thy praises every Muse shall sing!  
 In all affairs thou sole director;  
 Of wit and learning chief protector,  
 Though small the time thou hast to spare,  
 The church is thy peculiar care.  
 Of pious prelates what a stock  
 You choose to rule the sable flock!  
 You raise the honour of the peerage,  
 Proud to attend you at the steerage.  
 You dignify the noble race,  
 Content yourself with humbler place.  
 Now learning, valour, virtue, sense,  
 To titles give the sole pretence.  
 St. George beheld thee with delight,  
 Vouchsafe to be an azure knight,  
 When on thy breast and sides Herculean,  
 He fix'd the star and string cerulean.

Say, poet, in what other nation  
 Shone ever such a constellation!  
 Attend, ye Popes, and Youngs, and Gays,  
 And tune your harps, and strew your bays:  
 Your panegyrics here provide;  
 You cannot err on flattery's side.  
 Above the stars exalt your style,  
 You still are low ten thousand mile.  
 On Lewis all his bards bestow'd  
 Of incense many a thousand load;  
 But Europe mortified his pride,  
 And swore the fawning rascals lied.  
 Yet what the world refused to Lewis,  
 Applied to George, exactly true is.  
 Exactly true! invidious poet!  
 'Tis fifty thousand times below it.

Translate me now some lines, if you can,  
 From Virgil, Martial, Ovid, Lucan.  
 They could all power in Heaven divide,  
 And do no wrong on either side;  
 They teach you how to split a hair,  
 Give George and Jove an equal share.  
 Yet why should we be laced so strait?

type of work, as I mentioned previously in this post script, I actually see this as a meaningful (though possibly over-the-top) enactment of Bacchi and Goodwin's vision for step seven. Actively attempting to question and destabilize the assumptions that I was making in my analysis while also focusing strongly on representations (WPR does, after all, stand for What is the Problem Represented to be) felt insufficient for me, which prompted me to also consider *how* problems and answers were represented to be.

This dissertation serves as my answer to that question, however once again painted in the negative. Rather than drawing attention to how *this* dissertation is written, the deviations from traditional formats are intended to draw attention to how dissertations are written in general. As I have stated, it is my hope that the moments of ergodicity in this text highlight assumptions that are made when reading traditional dissertations, because seeing “non-ergodic dissertations” for their (apparent lack of) complexity can help

reveal the governing mentalities that we bring to their reading (e.g., what is “normal” for a dissertation, what makes them “logical,” etc.), which perhaps says more about us as readers and professionals than we notice. Even though some might suggest that I deviated from the WPR approach in my enactment of it in this dissertation, I could not have completed this work in this way without the path laid out by Bacchi and Goodwin.

### ***Muß es Sein(?) or: With Vorpal Sword in Hand***

How does this all come back around to anything meaningful? What does this have to do with teacher education, policy analysis, or teaching? What does this dissertation do? Each of these questions boils down to one that I have been asked repeatedly through this process, “so what?”

For me, bringing together so many different considerations in this way is a roundabout attempt at resolving two things that often, at least in my life, seem like opposing forces: hope and uncertainty. On hope, Freire said this, “Hope is an ontological need [...] I am hopeful, not out of mere stubbornness, but out of an existential concrete imperative (*av.* 6, p. 2). With regard to (un)certainty, Goodlad stated the following: “Educators must resist the quest for certainty. If there were certainty there would be no scientific advancement. So it is with morals and patriotism” (*ap.* 4, p. 6). Additionally, Goodlad noted that,

The most controversial issues of the twenty-first century will pertain to the ends and means of modifying human behavior and who shall determine them. The first educational question will not be ‘what knowledge is of the most worth?’ but

'what kinds of human beings do we wish to produce?' The possibilities virtually defy our imagination. (*av.* 33, p. 22)

Somewhere between these ideas—between hope and uncertainty—is where I find the future of the teacher education profession. I believe we are well-poised and well equipped to continue to question not only our own purpose(s), but also the purpose(s) of education, and importantly, whose work it will be to determine the answers to those questions.

Goodlad sets forth a (re)vision of the profession that is unwavering in its assertion that it is the tripartite (education faculty, arts and sciences faculty, and school partners) that is responsible for finding answers to these questions. However, it seems as though policy-makers are increasingly involved in and (ir)responsible for the direction that teacher education and public education take.

Regardless of the profession's readiness to answer difficult questions about how best to proceed, it is nonetheless the profession's work to do. During his testimony before the Senate about possible Russian interference in the *ap.* 16 US elections, former FBI Director James Comey said this:

We have this big, messy, wonderful country where we fight with each other all the time, but nobody tells us what to think, what to fight about, what to vote for, except other Americans, and that's wonderful and often painful.

But we're talking about a foreign government that, using technical intrusion, lots of other methods, tried to shape the way we think, we vote, we act. That is a big deal. And people need to recognize it. (*ap.* 17, n.p.).

Along similar lines, when discussing the return of the Newark Public Schools to local control, Newark Mayor Baraka had the following to say:

We now have control over our own children's lives. It doesn't mean that we won't make mistakes or there won't be any errors or obstacles ... we have the right to make mistakes, we have the right to correct them ourselves. We think that we know what's best for the kids in our city. (Baraka, as cited in Yi, *ap.* 17, n.p., ellipses in original).

What both of these statements have in common with one another and with this conversation about teacher education is that they speak to the difference between internal versus external influences: Director Comey's statement speaks to national sovereignty, and Mayor Baraka's to city-level sovereignty. Moreover, neither speaks to the idea that internal ideas are inherently better, or more agreed upon than external ones; rather, the right to one's own successes and failures is positioned as central to the rights of the people. Both Comey and Baraka, in fact, speak against the idea that insider control implies solidarity or agreement, with Fmr. Dir. Comey explicitly mentioning the tendencies of the American people to disagree with one another, and Mayor Baraka commenting on the right of the people to make and correct their own mistakes.

Within the context of teacher education, I see this sovereignty as the right of the profession, to be wielded with humility and care. Merely disentangling teacher education from external State governance does not suggest that unanimous agreement or consensus will necessarily follow. That said, the disagreements, "messes," and fights belong to the profession—to those who live, breathe, and enact the work of teacher

education on a daily basis. Freeing ourselves from external governance is not only about creating safeguards for our future securities that respect us as professionals (though it is certainly about that), it is also about declaring our right to determine how to enact our profession—the actions, decisions, measures, and knowledge that determine our successes and failures, bound and structure our work, and induct others into our ranks. To be free of these external influences requires not only the securing and protecting of our borders, but also the careful consideration and disentangling of our governmentalities from our perspectives. To “successfully” achieve autonomy of decision making without unpacking governmentalities would be to remain (mentally) shackled to the will and support of the State, which is no particular success at all.

Undertaking these endeavors is not only necessary, it reflects hope—they are not, as Freire notes, the stubborn defiance and protestations of a child in need of external, parental guidance, but an expression of the existential, concrete imperative of a profession that can (and must) function independently if we are to seek and enact an agenda for education in our democracy, as envisioned by Goodlad. We must carefully deconstruct and our own notions of professionalism, knowledge, and ways we engage with others and one another. In short, our work cannot attend only to the scraps that we can *find* at the (as yet) un-mandated margins of our work, (presently) ignored and unregulated by the State; instead, our work must focus on what remains when we deconstruct governmentalities and governance in teacher education, and the profession that we can construct and *found* for ourselves.

I'll give my monarch butter-weight.  
 And reason good; for many a year  
 Jove never intermeddled here:  
 Nor, though his priests be duly paid,  
 Did ever we desire his aid:  
 We now can better do without him,  
 Since Woolston gave us arms to rout him.  
*Cætera desiderantur.*

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