January 29, 2015

Sophia McArdle
U.S. Department of Education
1990 K St. N.W., Room 8017
Washington, DC 20006

Docket ID ED-2014-OPE-0057
RE: Teacher Preparation Program NPRM

Dear Ms. McArdle:

On behalf of the 1.6 million members of the American Federation of Teachers, of whom the vast majority work in the preK-12 and higher education systems, I am providing comments on the U.S. Department of Education’s proposed regulations to implement new requirements for teacher preparation program accountability.

Every child deserves a high-quality education with well-prepared teachers. And every teacher should feel prepared on their first day in the classroom. The current system for preparing teachers is a confusing patchwork of pathways into the teaching profession, with overlapping stakeholder responsibilities and multiple, uneven sets of standards. In our report, *Raising the Bar*, the AFT proposes overhauling the way our country trains, licenses and assesses teachers. We directly address, and offer solutions to, those overlapping responsibilities and uneven standards, and we believe that the department’s regulations should do the same. To effect real change, we recommend that entry into teaching, like entry into other professions, should be a respected and rigorous process. Standards, programs and assessments should be aligned with a well-grounded vision of effective teaching that includes the knowledge and skills that teachers need to be prepared to be competent and caring professionals from their first day of teaching. And these standards and assessments should be designed and driven by the the professionals themselves.

Unfortunately, the department’s proposed regulations suggest the opposite approach. They do not address our country’s methods for preparing teachers, nor do they support increasing the rigor and relevance of standards and assessments for new teachers. Instead, these regulations build on the K-12 high-stakes standardized testing system established by No Child Left Behind (NCLB), Race to the Top, and the waiver process for the Elementary and Secondary Education Act (ESEA). That system essentially puts all the onus for everything that happens in a child’s life on a child’s teacher, rather than broadening accountability and responsibility to students, schools, districts and other stakeholders. And yet, in these regulations, we see misplaced reliance on high-stakes testing as an evaluation tool for educators, and without the acknowledgment of the failures seen in similar K-12 efforts.
We question why the department would expect a different result from putting the same accountability system into place in higher education. We also believe that adding accountability requirements without supporting fundamental reforms will not produce any meaningful or beneficial changes in how we prepare teachers in this country. And worse, these regulations could harm the very students who could benefit the most from consistent, high-quality standards for entry into teaching: those who live in poverty and the growing number of English language learners, who are largely concentrated in high-need, urban schools.

We are also concerned that these regulations amount to another unfunded mandate for the states. The department makes optimistic claims about the low cost and impact of the new data collection requirements. Yet the claims that state data systems are up to the demands of the regulations rest only on “assurances” of state actions in building these systems. And the department admits that it has “limited information” on how or if information about teacher employment and retention is currently collected in the states. The California Department of Education, the California Commission on Teacher Credentialing, and California State Board of Education issued a joint letter estimating that these regulations will cost their state hundreds of millions of dollars. We expect a similar burden for states across the country, forcing them to divert scarce funds that could be used to carry out the very interventions that students need from their higher education and K-12 systems.

We believe that a number of specific areas of these regulations need attention. Below, we offer our comments and recommendations for each of those areas:

**Teacher diversity**

More than ever before, our nation’s tremendous diversity is reflected in our public school students. Step into a public K-12 classroom, and you will see that students are more likely to come from a wide range of racial, religious and cultural backgrounds—about half of the students in public schools are now children of color—and less likely to speak English as their home language. Our student population is also, increasingly, coming from low-income families; a recent study showed that half of public school students are eligible for free or reduced-price lunches. At the same time, while the diversity of our student population is growing, teachers of color make up less than 20 percent of the teaching force.

Given all this, we would expect that the issue of teacher diversity would be addressed in the proposed regulations, but it is not. We acknowledge that the department did include a statement on teacher diversity in its list of “three core elements to improve teacher preparation.” This statement, the third of the three core elements, claims it is a department goal to “provide more support for HIEs [institutions of higher education] that prepare high-quality teachers from diverse backgrounds.” Unfortunately, the next sentence reveals that “The proposed regulations address the first two elements of this
plan,” meaning that the third element, teacher diversity, is simply left out. It is appalling, and an indication of the disconnect between these regulations and the realities of our public schools, that the department would propose regulations on teacher preparation that do not address how to promote teacher diversity.

**Disadvantages for preparation programs that serve high-need schools**

More than two-thirds of the variations in student achievement are attributable to factors outside the classroom,¹ and it is well-known that student test scores tend to be lower at high-need schools. Students at high-need schools consistently score lower on standardized tests due to factors such as poverty, segregation and inequitable funding.² In addition, teacher turnover is higher in high-need schools,³ which are continually strapped for resources.⁴ All of these realities have the potential to produce lower ratings, on the proposed outcomes metrics, for programs that encourage teachers to teach in high-need schools or to work with students with high needs. There are no strategies in these regulations to counteract these unfortunate realities. We would expect that any new regulations on teacher preparation would encourage programs to develop models that focus on preparing teachers to work in these schools. These proposed regulations do nothing of the sort.

In fact, programs that prepare teachers for high-need schools will be more likely to receive poor ratings, lose funding and be shut down. What could this mean for such programs? They would have an incentive to train their program participants to work in less-challenging environments that will produce higher scores on state report cards. Programs that continue to prepare their program participants to work in high-need schools, and that encourage them to do so after graduation, will be in danger of being labeled as low-performing simply by virtue of the population they serve. We must question why the federal government would seek to trap teacher preparation programs in this Catch-22.

This issue further amplifies our concerns (stated above) about these regulations’ impact on teacher diversity. Because teachers of color are mostly concentrated in high-need, urban schools, these regulations might actually widen the diversity gap between public school students and teachers. And this impact would be felt in particular by programs at historically black colleges and universities (HBCUs) and minority-serving institutions (MSIs); HBCUs train half of our nation’s African-American teachers, while two Hispanic-serving institutions (HSIs) prepare more than 90 percent of our Hispanic teachers, most of whom go on to teach in high-need, urban schools.

The regulations attempt to adjust for the built-in disincentive for preparing teachers to work in high-need schools by using, as a separate metric, data about how many program graduates teach in such schools. However, the result directly conflicts with other Department of Education guidance. The department’s Office for Civil Rights has identified “access to experienced teachers” as one metric that districts must provide on an equitable basis, giving districts a disincentive to seek out new teachers for high-need
schools at the same time these teacher preparation regulations are ostensibly encouraging more new teachers in high-need schools. Contradicting and disregarding a metric that is a priority for OCR is insulting and perpetuates the very privilege we must dismantle in order to elevate racial justice.

**Different ratings systems for different paths to teaching**

The AFT shares the goal of the department that every teacher should be prepared on his or her first day in the classroom. However, we believe this should hold true regardless of which path a teacher takes to enter the profession. The proposed regulations do not rate teacher preparation programs on a level playing field. Instead, they encourage a two-tiered system by allowing states to use different definitions and categories for traditional teacher preparation programs and alternative certification programs. And this system will not be fair: Alternative preparation programs can receive significant advantages from these differences. Such a system will not solve the problem of uneven standards in teacher preparation.

Indeed, it is hypocritical that the department’s underlying rationale for the need for these proposed regulations is to provide uniform information about program quality, while the regulations allow for traditional and alternative programs to be rated separately. A single rating system for preparation programs is intended to make information easier for school districts to use in their hiring process, and for prospective students to use in making decisions on which program to enter. But by skewing the data to make one type of program look more successful in employment or retention, and by allowing for different success thresholds, these regulations are useless in this regard. They are not even regulations by any common definition of the term, as they will not standardize the rating systems. This is one more way that these regulations are inadequate to the task of ensuring the quality of all teacher preparation programs.

**Indicators of teacher preparation program quality**

The proposed regulations lay out four indicators of teacher preparation program quality: student learning outcomes, teacher employment and retention measures, surveys of teachers and employers, and specialized accreditation or a state-provided equivalent. Each of these measures suffers from flaws, particularly when applied over a short timeline and with high stakes.

*Student learning outcomes*

One of the greatest flaws in the proposed regulations is the overreliance on standardized test scores as a way to supposedly measure the achievement of the students taught by program graduates or program participants. These regulations are based on the flawed assumption that test scores are solely the result of what teachers do in their classrooms. But the regulations go even further, since they rely on these same scores not only to judge teacher quality, but to judge the quality of the programs that prepared those teachers. Even if you leave aside the fact that K-12 standardized tests were never
developed to do such a job, this idea has questionable merit. K-12 students' performance is affected by a host of factors outside of the classroom. These test scores do not measure the context and content of student teaching experiences or other program features, which vary widely. Similarly, teacher performance is affected by many factors beyond teachers' preparation, including school climate, the student population served, and the effectiveness of induction programs. Put all of these factors together, and there is no hope that K-12 test scores can tell us anything meaningful about what teacher preparation programs are doing, or about the different impact of these diverse programs. That is why using these scores in this manner is an irresponsible way of measuring the quality of program graduates or program participants.

This problem is made worse when the regulations insist that “student growth” be included in the measures of K-12 student performance. Research has shown that growth models that use standardized test results, such as value-added models, are not valid or reliable for determining a teacher’s effectiveness. The Board on Testing and Assessment of the National Research Council of the National Academy of Sciences, the American Statistical Association, and even the U.S. Department of Education’s Institute of Education Sciences, have made strong statements about the limitations of value-added models, citing the instability in value-added estimates and the low percentage of value-added scores that can be attributed to teachers, and other experts in the field have raised similar concerns. So not only do these proposed regulations add a layer of high stakes onto measures of achievement, they also ignore a strong and growing research consensus by mandating this use of student growth measures.

Employment and retention

There are also problems with the required measures of employment outcomes and teacher retention. We do agree that this data could be useful for students looking to enroll in a teacher preparation program, and for districts seeking to hire program graduates. But as high-stakes measures of program performance, employment and retention statistics are deeply flawed. Quite simply, there are many reasons that individuals might choose not to enter teaching, or might choose to leave the profession. Rating preparation programs on retention ignores the many factors that could push a teacher out of the classroom, such as challenging school climates, low pay, inadequate support, little time for collaboration, overtesting, and limited paths for professional advancement. Unless program graduates are asked their reasons for leaving, or not entering, the profession, and those answers are factored into employment statistics, these measures cannot tell us whether program quality had anything to do with their decisions. This is actually an area where survey data from all graduates might make sense, though this is not how surveys will be used under these regulations.

It should also be noted that while data collection for program ranking begins in the 2016-2017 school year, the first potential impact of these ratings, where programs could lose TEACH grant eligibility, is set for the 2018-2019 school year. This is three years after the beginning of data collection. Yet the teacher retention measures require five years to make a determination, which would mean that the results would not be in until the
2021-2022 school year. This does not make any sense, and is yet another indication that the proposed employment-related measures will not produce useful data for high-stakes decisions.

Surveys

Surveys can be very helpful as tools, but not when tied to sanctions. They can allow insight into the impressions and opinions of program graduates and their employers, and states and teacher preparation programs could find it valuable to have access to such information. From this information, they could build their knowledge base about what is working, where there may be problems, and even how to improve. For these reasons, we believe that all programs should reach out to program graduates and district administrators, solicit their feedback, and involve them in the process of program improvement.

But once again, as with the employment measures, the proposed regulations take a set of tools that have the potential to provide useful data and instead turn them into high-stakes measures with sanctions. Even though such surveys might be valuable and informative, none have been developed as reliable and accurate measures for the purposes intended here. So why, if the use of survey methodology to determine the effects of teacher preparation programs is unproven, would surveys be required in federal regulations, and with high stakes attached? Like the use of K-12 student test scores, this mandated use of surveys is irresponsible.

Accreditation

The final proposed indicator is either specialized accreditation or an equivalent process managed by the state. We support voluntary, professional accreditation as a way of keeping an eye on program quality, but this requirement raises a somewhat technical point. While the proposed regulations call for specialized accreditation, the new specialized accreditor for teacher preparation, the Council for the Accreditation of Educator Preparation, is not currently a recognized accreditor according to the Department of Education. Because CAEP is not a recognized accreditor, even though it is set to become the sole accreditor for teacher preparation programs, we are unable to judge the merits of this indicator, except to say that it seems premature to put it into federal regulations.

In conclusion

While we appreciate that the department has joined us and many other stakeholders in proposing changes to our system for preparing teachers, these proposed regulations have missed the mark. Countries that perform well on international comparisons focus on building high-quality preparation systems, good working conditions for teachers, and good induction programs, not on sanctions-based accountability systems. This sort of
system wide approach to building the teaching profession is consistent with our recommendations in Raising the Bar.

Finland, often cited as an example of high-quality teacher preparation, shows us what we might aim for in reforming how we prepare American teachers. Prospective teachers in Finland receive extensive subject matter, pedagogical and clinical training, in programs that are both highly selective and free of cost. There are no alternative preparation programs, and no confusing variety of ways to end up in charge of a classroom. Teachers then go to work in supportive, professional environments, with strong unions and without punitive, high-stakes standardized testing.

Unfortunately, the department’s regulatory proposal does not promote anything like the system in place in Finland, nor does it aim to improve the ways we prepare teachers in the United States, as we recommend in Raising the Bar. Instead, the department is opting to follow the same old measure-and-punish accountability model that has been imposed on K-12 education. The results are predictable: Students who need the most support, and the teacher preparation programs that send teachers to serve those students, are most likely to be harmed by these regulations.

Every child deserves well-prepared teachers, but what the department has proposed is a quick fix, aimed at convincing the public it is doing something. There is no quick fix when it comes to overhauling teacher preparation in the United States. If there were one, it would have already been done, since no one—particularly teachers—wants teachers to walk into classrooms unprepared. We should seek to elevate the profession of teaching, increasing the relevance, rigor and clinical aspects of our teacher preparation system while promoting consistent standards and improving induction support, working conditions and professional opportunities for all teachers. This approach—not penalizing programs with harmful regulations—is the sustainable solution we need to ensure that every classroom is led by a well-prepared teacher.

Sincerely,

Randi Weingarten
President


