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Docket ID ED-2014-OPE-0057

The Honorable Arne Duncan
Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Secretary Duncan:

Thank you for the opportunity to respond to proposed United States Department of Education (USED, Department) regulations (Federal Register, December 2014) intended to guide significant improvement in the quality of education preparation programs and educator preparation outcomes. This response from the National Association for Alternative Certification (NAAC) represents the organization's membership from 39 states and the District of Columbia. Members comprise non-traditional (alternative route) educator preparation providers, administrators and preparation candidates based in institutions of higher education, school systems and regional education service agencies, and in non-profit and for-profit provider programs, school and district level employers, and local and state policy makers.

NAAC supports quality measures of teacher preparation that "reflect the true quality of these programs and provide information that facilitates program self-improvement and, by extension, student achievement" (p. 71820). We further support the goal of evaluating teacher preparation programs based on outcomes.

The current proposal appears to include elements that are counter to USED goals and the success of educator preparation providers in accomplishing intended goals and objectives in a widely doable, efficient, and cost-effective process. The proposed regulations may significantly increase the regulatory burden on providers in the improvement process. Incurred costs appear to significantly inhibit the benefits of short- and long-term outcomes.

Given that NAAC is in general support of federal efforts to significantly improve the quality of teacher preparation and resulting teachers, NAAC offers the following observations and recommendations for your consideration:

1) As stated on p. 71824 of the proposed regulations, "the Department currently estimates that approximately 75 percent of participating students will not complete the required service obligation" of the TEACH Grant program. It further states, "we believe that a larger percentage of TEACH Grant recipients will be able to fulfill their service obligations if they have been prepared by strong teacher preparation programs." It seems the primary goal of the new Title II regulations is to ensure that TEACH Grants are provided to students that are more likely to complete their obligations; an effective and efficient method to achieve the preparation program and TEACH service repayment conditions is through development of a system that tracks each preparation program's success relative

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to the percentage of its graduates that avail themselves of TEACH Grants and subsequently fulfill their obligation. Restricting providers' candidates to accessing future TEACH Grant funds is reasonable if a provider falls below a defined threshold of completers that meet service repayment obligations. It can be reasonably assumed that along with individual program ability to "Provide to prospective teachers the knowledge and skills necessary to succeed in the classroom," (p. 71824) and to achieve high placement and retention rates, life-factors associated with teacher candidates and completers are contributors to TEACH recipients' fulfillment of service obligations. Rather than create a complicated and costly proxy that requires every state to report student learning outcomes, employment outcomes, survey data, and more as a means to determine which programs should be eligible for TEACH Grant funds, the Department should use a more direct determination in TEACH reporting of which programs actually reach a defined threshold of TEACH Grant service obligation fulfillment.

- 2) The proposed regulations state on page 71871, "Our key objective is to revise Federal reporting requirements to reduce institutional burden, as appropriate, and have State reporting focus on the most important measures of teacher preparation program quality while tying TEACH Grant eligibility to assessments of program performance under the title II accountability system." The proposed regulations also state that currently, states and educator preparation programs "fill out annual questionnaires having a combined total of almost 600 fields" (p. 71823). The proposal dramatically underestimates the burden of carrying out the new reporting requirements. NAAC recommends a revision to clauses such as this one to streamline the relevance, accountability, and reporting processes at the institutional and state levels.
- 3) Mandating that every teacher preparation program track and report the placement and retention rates of every new teacher over four years after program completion does not, from a data reliability viewpoint, seem a feasible expectation or solution; and the regulatory cost, technology, and personnel burden appear prohibitive for many alternative route preparation programs nationally. By carefully screening, selecting, and placing preparation candidates using research-based instruments that predict the likelihood of teachers' persevering in the field, alternative preparation program providers and the NAAC organization foster the premise that the retention of high quality new teachers is of critical concern and importance for stability in student instruction and achievement and overall school improvement. To that end NAAC is currently analyzing data from a retention study in which member program-providers voluntarily participated. In our second year of the study, NAAC is learning is that it is difficult and expensive for programs to capture and accurately report retention data at a first tier level of response. Based on these findings, it appears that many traditional and non-traditional preparation providers will be at severe financial difficulty to collect and submit data at the level and timeframe that the Department envisions. NAAC supports a phased-in strategy for teacher placement and retention tracking and reporting.
- 4) The proposal as currently written impacts all programs and states by adding burdensome data collection and reporting requirements when they are already low on resources - for the purpose of identifying and sanctioning the relatively small percentage of programs that are of lower quality. The proposal creates unfunded mandates and expects states to take on added responsibility for providing technical assistance to low performing programs. NAAC recommends that the Department identify more efficient and cost effective ways of identifying low performing programs.
- 5) The proposal mandates the indicators upon which 25,000 teacher preparation programs that annually prepare approximately 200,000 new teachers a year will be rated. The Federal Register states on page 71862 that only a few states can currently connect student learning outcomes to teachers' preparation programs. This is despite the fact that the federal government has already "awarded \$575.7 million in grants to support data systems that, among other things, allow States to link student achievement data to individual teachers and to postsecondary education systems" (p. 71862). NAAC strongly encourages USED to reconsider this requirement, its complexity, purpose, timelines, cost effectiveness, and use of the collected data to accomplish the goal by creating a more efficient and effective method of linking teacher preparation to student learning outcomes.
- 6) The majority of alternative route-to-certification programs are founded on an evidence-based philosophy that teacher preparation programs should prepare teachers to meet the needs of targeted

local educational agencies (LEAs) and schools by focusing on and producing well-qualified teachers for high-need/hard-to-staff schools and content areas. The regulations as proposed could, with a high probability, have the unintended consequence of discouraging programs from targeting placements of teachers in the highest need schools, and instead encourage programs to steer new teachers toward employment in schools that have higher student learning outcomes.

For these and other reasons noted by fellow respondents from across the country, NAAC is concerned with the regulation's statements that the Department is "issuing these proposed regulations only upon a reasoned determination that their benefits justify their costs," (p. 71850) and that the plan to improve teacher preparation would "Reduce the reporting burden on IHEs while encouraging States to make use of data on teacher effectiveness to build an effective teacher preparation accountability system driven by meaningful indicators" (p. 71854). Our review instead yields strong caution that the proposed regulations do not reduce the reporting burdens and may not result in the teacher preparation improvement and accountability or the increased student achievement rates intended by the rule revision.

Thank you for your attention to the matter of creating sound and reasonable teacher preparation regulations that can be accomplished by all providers of alternative and traditional route programs.

Sincerely,

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