

Higher Education Task Force on Teacher Preparation

Federal Teacher Preparation Issues and Concerns

The higher education community is eager to work with Congress to develop strong federal policies that scale up effective teacher preparation programs, provide meaningful accountability, and lead to program improvement. We strongly support efforts to improve teacher preparation programs; however, we are concerned by the U.S. Department of Education's recent negotiated rule making on teacher preparation issues.

The Department is attempting to undercut congressional authority in these matters, and the Department's proposals put forward during negotiated rule making are problematic on several fronts. The proposals circumvent current statute, apply the tenets of NCLB to higher education, prescribe an untested one-size-fits-all accountability model for teacher preparation, and infringe on states' rights to oversee their teacher preparation programs.

Following is a summary of our concerns:

The proposed regulations apply tenets of No Child Left Behind to higher education.

- The regulations would require states to rate every teacher preparation program on a 1-4 rating scale and to use criteria that have not been determined to be valid and reliable for this purpose. There is no statutory authority for either requirement.
 - Criteria such as value-added scores of K-12 students of program graduates, job placement rates, and job retention rates are problematic.
 - These criteria have not been documented by research to be valid and reliable measures of preparation program effectiveness.
 - Multiple factors outside of graduates' preparation have an impact on their ability to find a job and their decisions to remain in or leave the teaching workforce.
 - Multiple factors influence K-12 student performance beyond the teacher's preparation, such as school working conditions, school leadership, and school resources.
 - The criteria represent federal overreach and may violate state laws.
- Proposals provide waiver authority to the secretary even though there is no statutory authority to do so.

The proposed regulations present several workability challenges.

- Although many states are building data systems, few of these systems are developed enough to follow graduates into the workforce, as would be required by the proposed regulations.
- Linking programs' ratings to their eligibility for TEACH grant participation would cause unpredictability each year as to which programs are TEACH grant eligible. Such changeable status would confuse students, significantly increase the workload of student financial aid offices, and impede programs' abilities to recruit and retain teacher candidates in high-need preparation fields.

The proposed regulations tie eligibility for student aid to the rating of the teacher preparation program—an unprecedented reach of federal policy that ignores current statute.

- Student financial aid should be based on the students' financial need and the quality of the institution (as determined through institutional accreditation), not on the programs in which they enroll.
- Such a rule could unfavorably impact students with limited access to preparation programs if those programs have low ratings.

The proposed regulations increase the regulatory burden on states and preparation programs without increasing funding.

- The proposal adds multiple reporting requirements – not authorized by statute – to the current institutional and state teacher preparation report cards.
- The cost for collecting the new data, such as for conducting annual employer and graduate surveys, could be exorbitant.

The proposed regulations would disproportionately impact minority serving institutions (MSI) and programs that prepare educators for high-need schools or school populations.

- Given that the proposed regulations rely heavily on graduates' impact on K-12 student performance (through standardized tests) as a measure of preparation program quality, MSIs and other programs preparing educators for high-need populations will be at an automatic disadvantage in the program evaluation metrics.
- English learners, high-poverty students, and students with disabilities often do not perform well on standardized tests which are used in value-added systems. Programs preparing teachers for these high-need populations would likely rate poorly, potentially leading to shrinking or closing these programs. Ultimately this would exacerbate the shortage of these teachers.

Higher Education Task Force on Teacher Preparation—Members and Contacts

American Association of Colleges for Teacher Education	Jon Gentile, jgentile@aacte.org
American Association of State Colleges and Universities	Makese Motley, motleym@aascu.org
American Council on Education	Becky Timmons, becky_timmons@ace.nche.edu
American Psychological Association	Jenny Smulson, jsmulson@apa.org
Association of American Universities	Mollie Benz, mollie_benz@aau.edu
Association of Jesuit Colleges and Universities	Cyndy Littlefield, cyndylit@aol.com
Association of Public and Land-grant Universities	Sang Han, shan@aplu.org
Council for Christian Colleges and Universities	Shapri LoMaglio, slomaglio@cccuc.org
National Association of Independent Colleges and Universities	Stephanie Giesecke, stephanie@naicu.edu

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