



National Association of Independent
Colleges and Universities

Here are some estimated implementation costs for key areas of the teacher preparation programs proposed regulations. Comments on these estimates are due at OMB by January 2, 2015.

- **Assurance of Accreditation:** The Department of Education estimates that it will take 2 hours per teacher preparation program for a state to determine whether the program either has specialized accreditation or provides teacher candidates with content and pedagogical knowledge and quality clinical preparation, and has rigorous entry and exit standards. This estimate does not include any estimate of the cost of pursuing specialized accreditation if an institution does not already have it, nor does it provide an estimate of the time it would take for a state to determine if program that does not have specialized accreditation is able to meet the alternative standard. *Would this estimate be realistic for your institution?*
- **Institutional Report Cards:** The Department estimates the initial burden for each institution of higher education (IHE) to adjust its recordkeeping systems to report data for each program would be 4 hours. *Based on your existing Title II Institutional Report Card recordkeeping, would 4 hours be enough time to update the data collected to meet the new requirements?*
- **Stakeholders meetings:** The Department estimates states would need at least 35 hours to discuss methods for ensuring meaningful differentiation of performance, and defining the method for their ratings of “significant” and “satisfactory,” as key indicators. However, the Department assumes some states may have already established committees to meet these requirements at no additional costs. *Based on your experience in working with a coordinated effort on teacher preparation in your state, does this estimate reflect a reasonable amount of time to agree on state plans for the state report cards?*
- **Privacy:** The Department estimates states would need up to 14 hours to review and analyze state and federal privacy laws on program size thresholds (note: the regulation requires programs with 25 students or more to report to the state). *Based on your experience with educational privacy issues at your institution and in your state, is this estimate reasonable?*
- **Student Learning Outcomes:** The Department assumes that because all states have provided the assurance that teachers are provided with student growth measures for reading and math through their applications for State Fiscal Stabilization Funds (2009 stimulus money), no additional costs will be incurred to measure student growth in “tested grades and subjects.” The Department also claims the 43 states and D.C. with NCLB waivers would not incur additional costs to measure student growth in non-tested grades and subjects. *Based on your experience sharing student learning outcomes measures with your state, would this estimate make sense in your state?*

- **Linking SLO to Teacher Preparation Programs:** The Department estimates the cost of linking student learning outcomes to teacher preparation programs will depend on the data available in each state's Statewide Longitudinal Data System (SLDS). The Department assumes that because 47 states, D.C. and Puerto Rico received \$575 million in grants for SLDS, they should be able to link student achievement to teachers, and the teachers to institutions. *Based on the status of your state's data system, and your institution's participation in this system, does this estimate reflect the cost to your state or institution to make this link?*
- **Employment outcomes:** The Department assumes the 41 states with SLDS can link data on teachers with their programs and current certification status and placement; are in the process of making these links; or plan to add this capacity. If the 11 remaining states cannot make this link, they may need to obtain the information from the programs or teachers themselves, at an estimate of 150 hours for these 11 states. *Does this estimate seem reasonable for your institution and state?*
- **Survey outcomes:** For states without teacher and employer surveys, the Department estimates it would cost the average state about \$25,000 to develop the survey instruments. But, the Department assumes that with the availability of online surveys, and the ability to fold teacher preparation questions into existing surveys, these costs could be over-estimates. *Based on your experience with teacher and employer surveys, does this estimate reflect the cost?*