

Higher Education Task Force on Teacher Preparation

August 29, 2014

The Honorable Tom Harkin
Chairman, Committee on Health, Education Labor and Pensions
U. S. Senate
428 Senate Dirksen Office Building
Washington, DC 20510

Dear Chairman Harkin:

The Higher Education Task Force on Teacher Preparation (or Task Force) welcomes the opportunity to comment on the discussion draft of the Higher Education Act (HEA) offered by Senator Harkin. The Task Force is convened by the American Association of Colleges for Teacher Education and represents the broad spectrum of teacher preparation providers in this country.

The start of the reauthorization process offers an excellent opportunity for policymakers and practitioners to examine the role of the federal government in teacher preparation, and work together to enhance federal programs and oversight. We share Senator Harkin's goals of continually strengthening teacher preparation programs, and improving the outcomes for teacher candidates. With those goals in mind, we are concerned that the proposals outlined in Title II of the discussion draft represent contradictory approaches. While we support the ways in which Parts A and D build on effective practice and proven methodology, we would oppose Parts B and C as damaging steps in the opposite direction.

The revisions to the existing Teacher Quality Partnerships program (sensibly renamed the Educator Quality Partnerships Program) in your draft are welcome changes. This proposal reaffirms the commitment to the only federal investment in reforming teacher preparation at institutions of higher education. This proposal was developed in collaboration with cutting-edge professional practice, and has broad support from teachers and the teacher preparation community. As written, Part A in the discussion draft contains a number of valuable policy components, including: accountability measures based upon valid and reliable research; evaluations based upon multiple measures; the usage of data for improvement rather than punitive purposes; and the active participation of the states, which are principally responsible for teacher preparation. By incorporating these elements, the Educator Quality Partnerships would push colleges to make the types of program changes that are already revolutionizing teacher education on many campuses.

There are two problematic approaches in Part A we would like to address, though. The first is the requirement for grantee institutions to track their graduates for two years. Institutions lack the authority to compel graduates to maintain contact or provide information, and would be unable to guarantee compliance with this requirement. The other provision of concern is the use of certain unproven outcome measures (including Value Added Measures, discussed in more detail below) to determine program performance.

We are also strongly supportive of re-authorizing the Augustus F. Hawkins Centers of Excellence program, as done in Part D of the discussion draft. As you know, this program is aimed at ensuring that Minority-Serving Institutions are well positioned to produce more teachers of color for our nation's increasingly multi-cultural schools and classrooms. Given the critical need to diversify the teaching workforce to include effective teachers from all backgrounds, your support for this program is commendable.

As mentioned above, though, the Task Force opposes the State Innovation Grants proposed in Title II, Part B. This proposal reflects the Department of Education's 2012 failed approach in negotiated rulemaking to link student performance assessments to a teacher's preparation program, and tie teacher candidates' TEACH Grant eligibility to this calculation. Our members strongly support holding teacher preparation programs accountable and work hard at continuous improvement. Unfortunately, the Educator Preparation Program Accountability and Improvement System as written would significantly impede meaningful accountability and limit the kinds of program improvement it seeks. Rather than employing the innovative and effective techniques already in use by numerous institutions, states and accreditors, this system would prescribe a top-down approach that will stifle innovation and hamper progress.

The Task Force also is concerned about the approach taken to data collection as proposed in Part C. It represents an unwarranted overreach by the federal government into the role the states play in overseeing teacher preparation, without any clear indication that the data will be used in any meaningful way. With over 25,000 teacher preparation programs in the United States, the reporting required of institutions and states in Part C would be excessively burdensome and difficult to comply with, and would pose sizable privacy concerns if enacted. This draft also includes a provision that would impose fines of up to \$27,500 on institutions for not providing this data under exceedingly broad criteria, which is especially concerning in light of the difficulties institutions would have in obtaining the required data.

Additionally, Part C would require states to justify why they did not identify any programs as low-performing. Teacher preparation is a state-licensed practice and is inherently a state responsibility. If the state program approval, voluntary accreditation and internal program review processes are working, it is possible to not have low-performing programs because the state either worked with the program to improve, or closed the program because of its internal findings. We believe this program quality enforcement role must remain with the state.

Related to our concerns with Parts A, B and C, the Task Force strongly opposes the use of Value Added Modeling (VAM) in any effort to assess the quality of a teacher preparation program. Numerous rigorous studies have demonstrated that VAM is highly problematic in the assessment of teacher performance, and completely unreliable in any effort to assess teacher preparation. A number of states and the District of Columbia have dropped or frozen the use of VAM in teacher assessment due to the failings of the approach. A federal mandate to use this widely discredited measure would necessarily result in erroneous findings and significant negative consequences.

Such prescriptive approaches ignore much of the work that is already taking place on campuses. In particular, the teacher preparation community has recently come together to create rigorous standards for program improvement and accountability through the Council for the Accreditation of Educator Preparation (CAEP). Imposing substantial new federal regulations and requirements before these efforts have had a chance to produce results would be counterproductive to the goal of strengthening the educator workforce.

Thank you again for the opportunity to share our feedback on the Title II discussion draft. We would be pleased to meet with committee staff to discuss our concerns in more detail as they work toward getting a draft ready for introduction. Please feel free to contact AACTE's Director of Government Relations, Deborah Koolbeck to convene the appropriate points of contact for the Task Force's membership at dkoolbeck@aacte.org or via phone 202-478-4506 (direct) to set up a meeting to discuss.

Sincerely,

The Higher Education Task Force on Teacher Preparation

American Association of Colleges for Teacher Education
American Association of State Colleges and Universities
American Council on Education
Association of American Universities
Association of Jesuit Colleges and Universities
Association of Public and Land-grant Universities
Council for Christian Colleges and Universities
Hispanic Association of Colleges and Universities
National Association of Independent Colleges and Universities
United Negro College Fund