

NEW COLLEGES OF EDUCATION –

A PATH FOR GOING FROM CONCEPT TO REALITY

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September 2017



EDUCATION
REFORM NOW



KEY POINTS

- The current accreditor and gatekeeper to federal financial aid eligibility for teacher preparation programs either cannot or will not reform itself to make rigorous quality assessments based on teacher candidate outcomes.
- State and local superintendents and charter school leaders, independently or backed by philanthropy, can relatively quickly and at a low cost form a new accreditor of teacher education programs driven by student learning gains and job outcomes associated with teacher preparation program graduates rather than a checklist of program inputs.
- A new, outcome-oriented accreditor of teacher preparation programs operating with the support of the U.S. Department of Education capable of waiving current federal regulations restricting access to financial aid could spur the creation of a wave of new colleges of education that could revolutionize teacher education nationally.

NEW COLLEGES OF EDUCATION—

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There are at least two phenomena on which most progressive education reformers and teacher union leaders agree: our school system is inadequately and inequitably funded and our system of teacher education and training does not adequately prepare new and continuing teachers for the demands of an increasingly modern and diverse classroom.¹ In fact, the latter failure magnifies the former insofar as the neediest students in the most under-resourced, inequitably funded schools are taught by a stream of underprepared rookie teachers year after year.

High need students in under-resourced schools do not just experience one or two bad teachers over the course of a 12-year academic career. They experience a string of them, grade after grade, as more experienced teachers who have improved after a year, two, or three in the classroom transfer to more affluent schools and school districts. It is not uncommon for a low-income student to be taught by a rookie teacher in grades 1, 2, and 3. And because teacher quality is the number one in-school influence on student achievement, affected students in under resourced schools end up falling further and further behind their more advantaged peers. Societal inequality worsens.

Because political leaders have not wanted the U.S. Department of Education to determine which higher education programs, including teacher preparation programs, are of sufficient quality to warrant taxpayer support, the task of teacher preparation program quality control has been outsourced in large part to accrediting agencies. These agencies are peer organizations of institutions of higher education or postsecondary training programs recognized by the U.S. Secretary of Education to consecrate institutions of higher education and individual postsecondary education programs as being sufficiently adequate in terms of quality to participate in federal student financial aid programs.

If you think our accreditation system whereby existing suppliers effectively decide who else can be suppliers of services is a case of the fox guarding the taxpayer's hen house, you would be correct. Indeed in many ways, the heart of the quality problem in teacher preparation and higher education in general is that the system's chief guardians of quality, accreditors, are financially dependent upon dues-paying members—higher education providers—who in general are averse to new competition and student outcome-based measures of program quality.

Recent history validates that the current teacher preparation program accreditor, the Council for the Accreditation of Educator Preparation, is no better than other accreditors consecrated under this flawed system. In the case of teacher preparation though, the flaws of the accreditation system are magnified insofar as teacher candidates that postsecondary education programs fail to train adequately go on to have enormous influence on the outcomes of K-12 elementary and secondary education children and thus in too many cases perpetuate a cycle of education poverty.

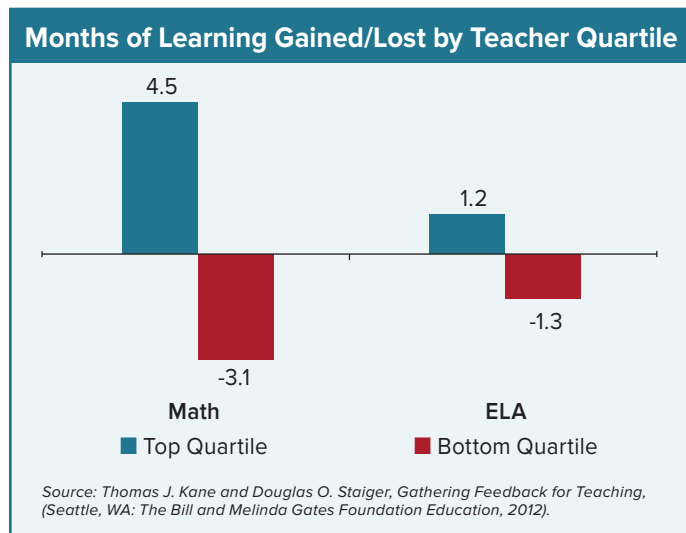
In our view, for teacher preparation accreditation to be effective, dependence on schools of education as guardians of teacher preparation quality must end. Because the current teacher education accreditor has shown it cannot and will not reform itself, **a new type of accreditor, not dependent on schools of education and their personnel, but instead on the employers of graduates from schools of education and teacher preparation programs, should be created. State and local superintendents of schools and charter school leaders in particular should band together to form an accreditor focused on the learning gains of elementary and secondary school students taught by the graduates of teacher preparation programs seeking accreditation and the assessments of employers of whether the graduates of teacher preparation programs are adequately prepared for classroom service.** The history of teacher preparation reform and improvement efforts, experience of leading states, and a close look at federal statute suggest this type of reform is necessary and doable at a relatively low cost.

The Problem

Almost no education stakeholder group is happy with the quality of teacher preparation nationally. Despite high GPAs in college-run teacher preparation programs and high licensure test pass rates, a majority of new teachers report dissatisfaction with their pre-service training. Nearly two-thirds of new teachers say they graduated from school of education programs under prepared for “classroom realities.”² A majority of superintendents and principals agree.³ According to a nationwide survey of school leaders, approximately three-quarters of new teachers leave schools of education with a degree and license in hand, but unprepared to: maintain order and discipline in the classroom; address the needs of students with disabilities, students with limited English proficiency; work with parents, etc., etc.—essentially the skills needed to do the job successfully beginning on day one.⁴

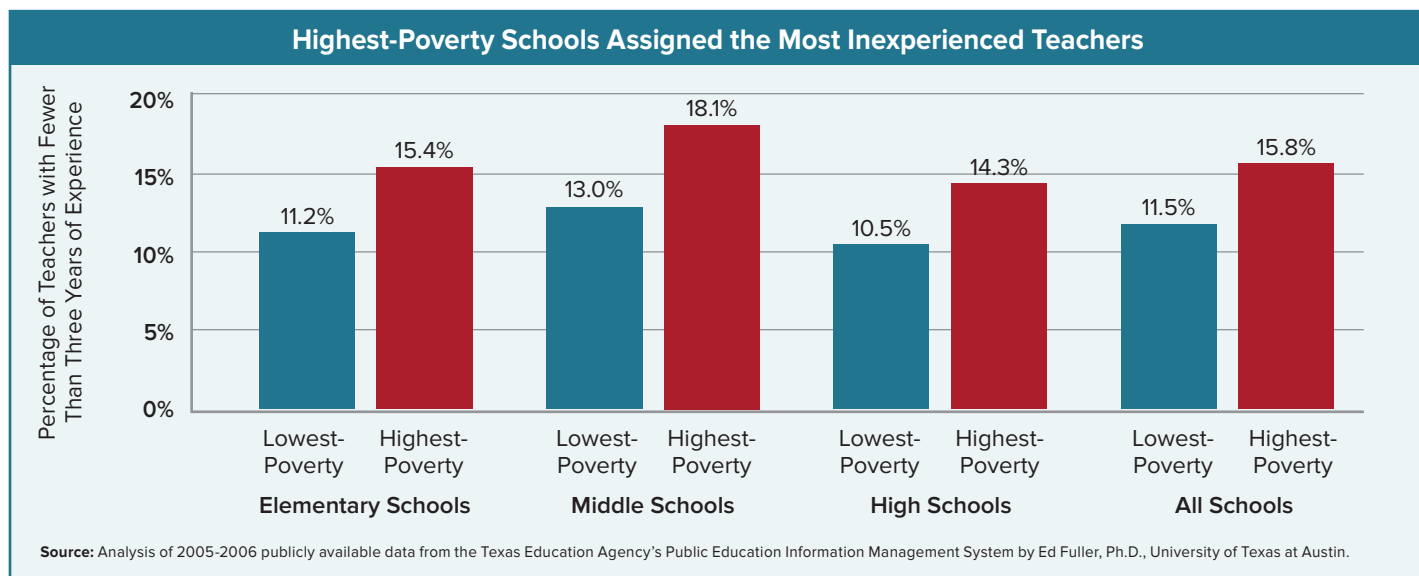
Well-regarded researchers concur as to the impact of inadequate teacher preparation.⁵ In fact, it is well-established among them that teacher quality is the most significant in-school influence on student achievement.⁶ The gap between an effective and ineffective teacher’s influence on a student reaches the equivalent of nearly an entire school year. As illustrated in Figure 1, students with a top quartile mathematics teacher gain the equivalent of nearly four and a half months more in learning than similar students taught by an average mathematics teacher. At the same time, those with a bottom quartile mathematics teacher learn the equivalent of more than three months less than similar students taught by an average mathematics teacher.⁷ Bottom quartile teachers are disproportionately first and second-year teachers.⁸

Figure 1:



Indeed, if there is one local school rule of thumb among highly-educated parents, it is that you do not want your child taught by a rookie teacher. There is a marked improvement in teacher performance after year one on the job and additional improvement after year two.⁹ Unfortunately, there are more first year teachers, rookies, responsible for educating children than ever before as employment opportunities for women expand and the income gap between teachers and other professionals grows in years following initial entry in the workforce. Thirty years ago, if you asked the average teacher how long he or she had been teaching, the most common answer you would receive would be 15 years. If you ask that same question today, the most common answer you get is one year. The next most common answer is two years.¹⁰

Figure 2:

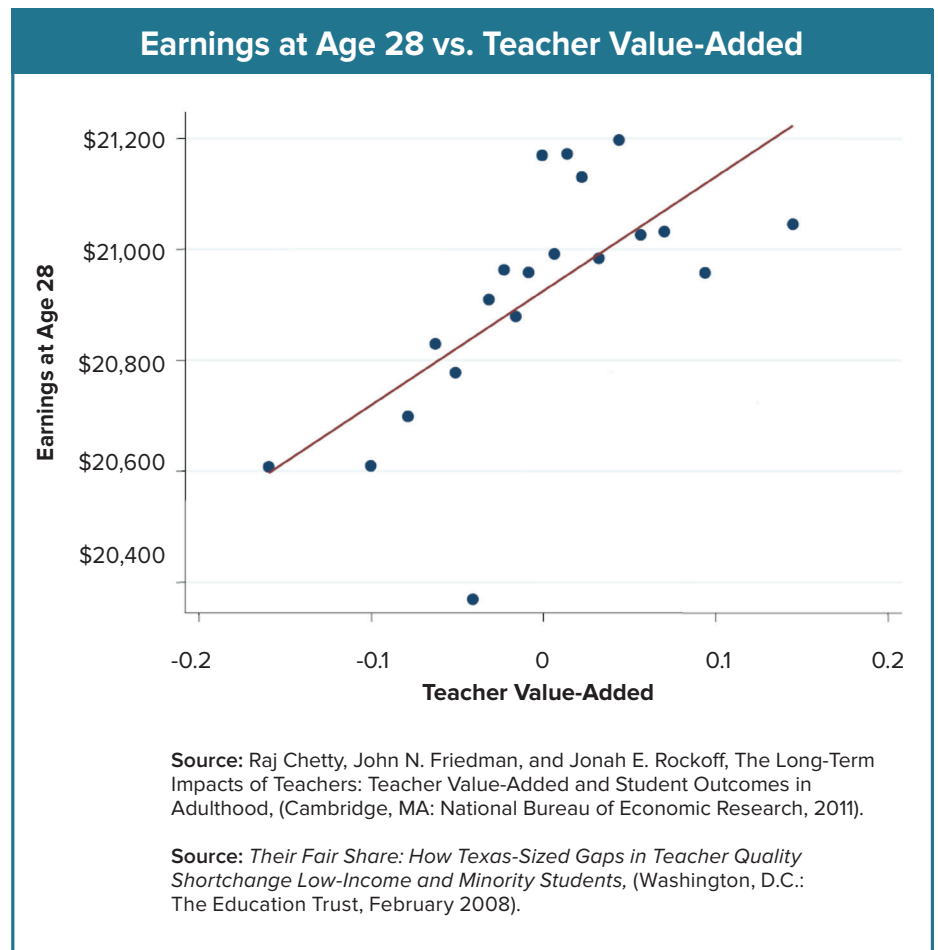


CIVIL RIGHTS ADVOCATES HIGHLIGHT THAT INADEQUACIES IN TEACHER PREPARATION DISPROPORTIONATELY HARM LOW-INCOME, MINORITY CHILDREN.

Civil rights advocates highlight that inadequacies in teacher preparation disproportionately harm education quality in low-income, high minority schools. As shown in Figure 2, schools in the highest-poverty quartile typically have 40 percent more rookie teachers than schools in the lowest-poverty quartile.¹¹ Because teacher quality is the number one in-school influence on student academic performance, and because education attainment translates into later adult earnings, the impact of being taught by a novice, ineffective teacher as compared to just an average teacher on earnings at age 28 totals some \$400 a year. That might not sound like much, but for one class of students it equates to some \$267,000 in lower lifetime earnings.¹² In other words, the combination of inadequate teacher preparation and high poverty schools serving as the battlefield on which new teachers learn on the job worsens societal inequality.

How did we get to this point? And what can be done about it so that more new teachers are, if not ready, close to ready on day one?

Figure 3:



ALL ROADS LEAD TO ACCREDITATION

POLICY FAILURE

Since the 1950s, teacher preparation programs — like nearly every other education program in the United States — have relied on a system of self-policing to ensure programs are of high quality.¹³ This system, commonly known as accreditation, uses external peer review to assess teacher preparation program quality against standards established by teacher preparation programs themselves as a group and to a lesser extent other key stakeholders.¹⁴

The overall accreditation process as we know it was created when it was difficult — if not impossible — to assess higher education outcomes and outputs.¹⁵ Unlike in elementary and secondary education, there are no voluntary national standards, common curricular paths, universally administered assessments or standards of proficient performance. Accordingly, peer review was and still is used by accreditors to assess educational processes and inputs.¹⁶ But as has become increasingly evident over time, a teacher preparation program can follow well-established standards of practice and employ what are deemed by the teacher preparation profession strong inputs and still produce teachers ill-equipped for success in the classroom.¹⁷ It's true that sometimes following program exit, new teachers ultimately gain the skills and confidence they need to be successful in the classroom.¹⁸ But all too many others stop teaching or continue doing a poor job for students. This is especially true in settings where a new teacher lacks strong support from and mentoring by master teachers or gifted school administrators. In any event, regardless of how long it takes for a teacher to become effective, having an ineffective teacher harms students who deserve a teacher ready on day one to lead his or her own classroom. The time for teacher preparation reform is now, if not past due.

Brief History of Teacher Preparation Accreditation

For much of the last 19 years, two accreditors were engaged in assessing the performance of teacher preparation programs. The National Council for the Accreditation of Teacher Education (NCATE) was created in 1954 when five organizations still in existence — the American Association of Colleges for Teacher Education (AACTE), National Education Association (NEA), National School Boards Association (NSBA), the National Association of State Directors of Teacher Education and Certification (NASDTEC), and the Council of Chief State School Officers (CCSSO) — came together to create an accrediting agency intended to ensure and improve the quality of teacher preparation.¹⁹

The Teacher Education Accreditation Council (TEAC) was created in 1997 as an alternative to NCATE and similarly established as its mission the recognition, assurance, and promotion of high quality teacher preparation to advance student learning.²⁰ TEAC was created by a group of institutions of higher education with highly selective admission processes, traditionally thought of as elite. These schools sought an accreditation process that was less expensive, less burdensome, and frankly less standardized.²¹ TEAC's approach to quality assurance simply was to require eligible applicants to submit an "inquiry brief" about their program's mission and goals.²² As of 2010, less than

Teacher Prep Accreditors (Prior to 2013)

	NCATE	TEAC
Founded	1954	1997
Membership	Education organizations	Institutions of higher education
Accreditation Process	Peer review	Inquiry brief
Number of Institutions Accredited	750+	~200

“TEACHER EDUCATION IS UNDER ATTACK BECAUSE IT DOESN’T HAVE HIGHLY PERSUASIVE EVIDENCE THAT ITS GRADUATES ARE COMPETENT.”

— FRANK MURRAY

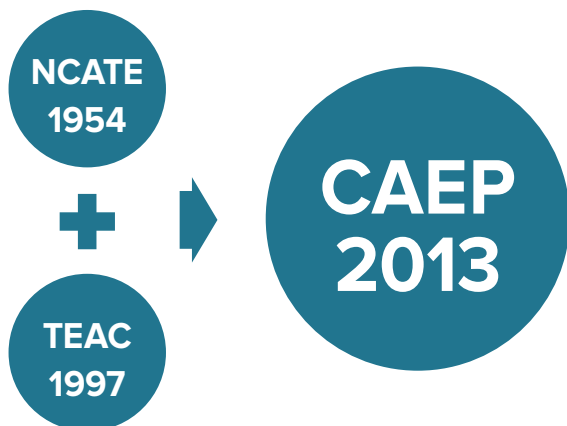
FORMER EXECUTIVE DIRECTOR OF THE TEACHER EDUCATION ACCREDITATION COUNCIL

200 of the nation’s more than 1,400 institutions of higher education providing teacher preparation services were accredited by TEAC. Over 750 were accredited or in the process of being accredited by NCATE.²³

Beginning in 2008, NCATE and TEAC began a merger process not just to ensure uniformity in teacher preparation program accreditation, but to upgrade the overall quality of teacher preparation programs nationwide and renew credibility in the broader education field.

“Our goal is not simply to bring together two organizations to do the same thing,” said James G. Cibulka, the president of NCATE at the time of the announced merger. “We really ought to have as our goal to raise the bar for quality educator preparation... and to speak with one voice about what that standard looks like, and how it should be implemented.”²⁴

TEAC’s Executive Director, Frank Murray, concurred. “Teacher education is under attack because it doesn’t have highly persuasive evidence that its graduates are competent... We have to keep pushing for that.”²⁵ By 2013 with the approval of their Boards, the new merged entity, the Council for the Accreditation of Educator Preparation (CAEP), was created.²⁶



Recommendations of upgraded, outcome-oriented standards followed CAEP’s creation. Among new standards CAEP initially sought to establish as part of the teacher preparation program accreditation process was a requirement that providing programs maintain a quality assurance system making use of statistically valid outcome data reflected in multiple measures. These measures included evidence of: (i) candidates’ and completers’ positive impact on pre-school through grade 12 student learning and development, and (ii) continuous improvement that is sustained, evidence-based, and separate from test scores, evaluates the effectiveness of completers.²⁷

In implementing the upgraded standards and evidencing impact on P-12 student achievement and overall candidate effectiveness, CAEP’s Commission recommended:

4.1 The provider documents, using multiple measures, that program completers contribute to an expected level of student learning growth. Multiple measures shall include all available growth measures including value-added measures, student-growth percentiles, and student learning objectives...

4.2 The provider demonstrates, through structured and validated observation instruments and/or student surveys, that completers effectively apply the professional knowledge, skills, and dispositions that the preparation experiences were designed to achieve.

*4.3 The provider demonstrates, using measures that result in valid and reliable data including employment milestones such as promotion and retention, that employers are satisfied with the completers’ preparation for their assigned responsibilities in working with P-12 students.*²⁸

THE TIME HAS COME FOR A NEW AUTHORIZER OF TEACHER EDUCATION PROGRAMS TO BE CREATED, ONE UNSHACKED BY FINANCIAL DEPENDENCE ON THE PROGRAMS IT ACCREDITS.

But these efforts to include outcome-based indicators of program quality in accreditation assessments as well as those of others to do the same proved extraordinarily controversial despite the success of a number of states, such as Louisiana and Tennessee, in creating just such an information “feedback loop” between teacher preparation programs and K-12 schools with respect to candidate success in affecting student achievement.²⁹ Education leaders ranging from the then President of the NEA, Dennis Van Roekel, to the founder of Teach For America, Wendy Kopp, lauded the concept.³⁰ But critically, the schools of education association, AACTE, whose members effectively finance the operation of CAEP through voluntary accreditation fees, objected fiercely to the new, more rigorous CAEP standards.

[T]he AACTE Board... asserts that there is a ‘crisis of confidence’ with respect to CAEP. Specific concerns are related to the accreditation standards, process for accreditation, costs associated with accreditation, the capacity of CAEP to implement the accreditation system and the representativeness of the CAEP governance structure.³¹

Three months after AACTE’s disapproving resolution, the CAEP Board of Directors fired the agency’s then Executive Director and shifted the accreditor’s new focus away from outcomes back toward processes and inputs.³² Disappointment among teacher preparation reform advocates was widespread.

This latest chapter in a long history of reluctance to upgrade standards for teacher preparation has led us to conclude the time has come for a new accreditor, or new authorizer if you

will, of teacher education programs to be created — one unshackled by financial dependence on the programs it accredits.³³

Much like the best charter school authorizers, a new teacher preparation program accreditor should:

- Be financially independent of those whom it accredits;
- Make use of outcome-oriented standards, objectively and fairly measured as well as publicly reported;
- Implement a transparent, rigorous approval and periodic re-approval process that makes use of academic, financial, employment, and operational performance data necessary for tiered, merit-based decisions — including revoking accreditation when necessary to protect student and public interests; and
- Identify groups of teacher preparation programs that meet tiered rating standards of quality (e.g. gold, silver, bronze).³⁴

Because CAEP cannot or will not reform itself, we suggest state and local superintendents of schools and charter school leaders band together to form a new teacher preparation program accreditor focused on both learning gains of elementary and secondary school students taught by the graduates of teacher preparation programs and assessments of employers as to whether the graduates of teacher preparation programs are adequately prepared for classroom service.

How can it be done? How long would it take? And how much would it cost?

THREE PATHS TO A POLICY SOLUTION

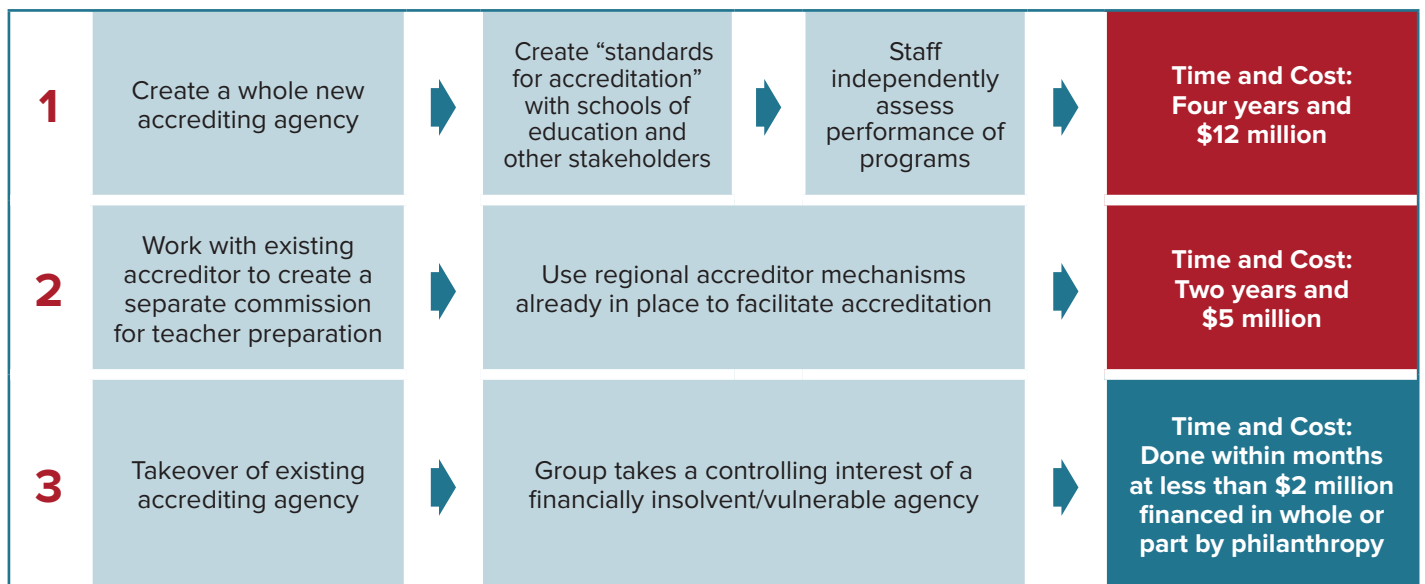
There are a number of ways one can create a new, outcome-oriented accreditor of teacher preparation programs that confers eligibility to participate in the \$150-plus billion federal student aid system (\$180 billion if you include student aid-related tax benefits).³⁵

The most straightforward approach would be to create a wholly new accrediting agency. As required by the Higher Education Act of 1965 and its implementing regulations, this approach would involve creation of a non-profit organization to serve in the relevant capacity, including the securing of requisite initial funding. This new non-profit organization would have to establish a commission that would create “standards for accreditation” in consultation with the schools of education, teacher preparation programs, and other key stakeholders, including school principals, charter management organizations, and state and local superintendents of schools. Ultimately, staff of that body would independently assess the performance of teacher education programs against those standards.³⁶ But such an approach would take many years and several million dollars. We estimate at least 4 years and \$12 million.³⁷

A second option would be to work with an existing accreditor of institutions of higher education in general and have that accreditor create a separate commission on teacher preparation under the umbrella of the existing non-profit in

which the accreditor is housed. A number of institution of higher education regional accreditors already have such a structure in place to facilitate the accreditation of different types of educational institutions and programs. For example, most regional accreditors have mechanisms in place to facilitate the accreditation of both 2-year and 4-year colleges and universities. This might not take as long or cost as much when compared with creating a new accreditor from scratch, but would still take approximately a year or two to accomplish and we estimate some \$5 million.³⁸

The third option, takeover, is most intriguing. The employers of teachers could band together to take over an existing accrediting agency. To accomplish this, the group would be wise to identify an existing accreditor that is financial insolvent, or at least, financially vulnerable. The takeover group could offer to assume some or all of the financial liabilities of the non-profit organization in which the accrediting organization is housed in exchange for a controlling interest on the governing board of said non-profit. At that point, the newly reconstituted board would decide whether to create a new accrediting commission for teacher preparation or merge that role with that of the existing accreditor.



Recommended: Accrediting Agency Take Over and Conversion

The advantages of the takeover approach are dedication to the specific cause of improving teacher preparation, minimal cost, and speed. Creating a new teacher preparation program accreditor via the takeover process would likely cost such a modest amount it could be financed in whole by private philanthropy. The newly reinvented accreditor would need to be financially prepared to meet up front and proof of concept expenses for the first year or 18 months of operation before it set and operationalized new accreditation standards for teacher preparation programs. Although, it might well continue to operate previous accreditation activities generating revenues to cover some if not all of those costs.

Impact could be substantially increased and new colleges of education supported with the assistance of targeted cooperation from the U.S. Department of Education that has the ability to consecrate an accreditor that in turn authorizes provider eligibility to participate in federal financial aid programs, including the federal student loan program.

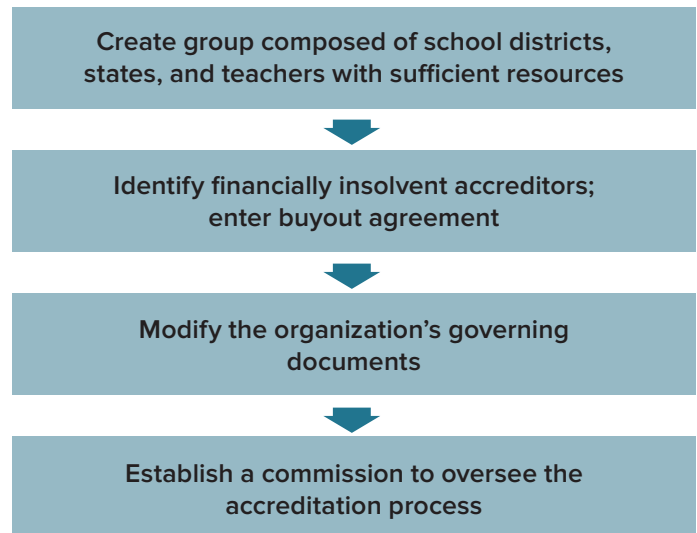
But first, what might a takeover spurring initial creation of outcome-oriented, new colleges of education look like?

How a Takeover Could be Carried Out

A small number of current U.S. Department of Education recognized accreditors are financially challenged. Take, for example, the American Academy for Liberal Education (AALE) which spent \$32,524 more than it collected in revenue in 2014, leaving the once U.S. Secretary of Education approved agency with just \$42,000 on hand.³⁹ AALE's financial situation improved only marginally in 2015, collecting \$23,597 and improving its balance on hand to \$65,640.⁴⁰ Or consider the U.S. Department of Education-approved Distance Education Accrediting Commission that took in \$75,000 less in 2014 than it did in 2007.⁴¹ Or there is the Accrediting Commission for Community and Junior Colleges that took in nearly \$1.6 million less than it expended in 2014 before marginally improving since with an operating deficit of \$48,505 in 2015 and a operating surplus of \$368,455 in 2016.⁴²

If a group composed of school districts, states, and teachers came together with sufficient resources, perhaps backed by philanthropy, to retire the outstanding debts or otherwise improve the financial health of one of these financially

PROPOSED TAKEOVER



challenged non-profit organizations – likely just a couple of hundred thousand dollars – that operate a U.S. Department of Education approved accrediting commission, it could obtain sufficient seats on the organization's board to take control.

Once that takeover group gained effective control of the non-profit organization, it would need to set about the task of modifying the organization's governing documents (charter and bylaws) to reflect a new or modified, and most importantly, student outcomes-oriented mandate. Once this charter and bylaw amendment task was complete, the board would likely establish a commission to oversee the accreditation process specific to teacher preparation. The commission would write accreditation standards and establish the necessary policies and procedures or adopt ones previously proposed in another context to accredit programs. Once these steps were completed, the commission could begin to accredit programs using the methods articulated in the policies and procedures adopted.

It may seem labor intensive, but the ousted leadership of CAEP already devised standards and recommended processes from which a commission could draw. Leaders of the association representing the current cartel of schools of education did not approve of them, but that does not mean the standards and recommended processes were not good or that they would not be welcomed by a new, less beholden accreditor composed of school district, state, and classroom teacher representatives.⁴³

THE SECRETARY OF EDUCATION CAN ALLOW ALTERNATIVE PROVIDERS OF TEACHER PREPARATION TO PARTICIPATE IN THE FEDERAL STUDENT AID PROGRAMS IF THEY HAVE THE OUTCOMES VALIDATED BY AN ENTITY RECOGNIZED BY THE SECRETARY SPECIFICALLY FOR THAT PURPOSE.

A Revamped Accreditor Could Spur Creation of “New Colleges of Education”

If the new accreditor elects to be recognized by the U.S. Secretary of Education and thus able to confer upon programs the ability to receive federal financial aid funds, which is essential to spur creation of new teacher preparation programs (e.g. new colleges of education), it would have to comply with a set of requirements prescribed by the Higher Education Act of 1965 and its implementing regulations. Specifically, the statute requires that accreditors have standards to assess the quality of the institution or program in the following areas:

- Curricula;
- Faculty;
- Facilities, equipment, and supplies;
- Fiscal and administrative capacity as appropriate to the specified scale of operations;
- Student support services;
- Recruitment and admissions practices, academic calendars, catalogs, publications, grading, and advertising;
- Measures of program length and the objectives of the degrees or credentials offered;
- Record of student complaints received by, or available to, the agency;
- Record of compliance with the institution’s program responsibilities under Title IV of the Act, based on the most recent student loan default rate data provided by the Secretary, the results of financial or compliance audits, program reviews, and any other information that the Secretary may provide to the agency; and
- Success with respect to student achievement in relation to the institution’s mission, which may include different standards for different institutions or programs, as established by the institution, including, as appropriate, consideration of course completion, State licensing examination, and job placement rates.⁴⁴

There are a series of regulations and subregulatory guidance letters governing these components of review.⁴⁵ **But these components of review can be waived in whole or part by the Secretary of Education as per use of her experimental site authority, thus essentially supporting new colleges of education freed from many existing input-oriented entry requirements of dubious value.**⁴⁶

Section 487A(b)(3) of the Higher Education Act provides:

(A) IN GENERAL.—The Secretary is authorized to periodically select a limited number of additional institutions for voluntary participation as experimental sites to provide recommendations to the Secretary on the impact and effectiveness of proposed regulations or new management initiatives.

*(B) WAIVERS.—The Secretary is authorized to waive... any requirements in this title, including requirements related to the award process and disbursement of student financial aid....*⁴⁷

In other words, the Secretary of Education could allow alternative providers of teacher preparation that are not a school or college of education or that is otherwise a component of an institution of higher education to participate in the federal student aid programs if they have the outcomes they achieve validated by an entity recognized by the Secretary specifically for that purpose. Depending on how the experiment is ultimately designed, the alternative provider might need to partner with one of the more than 7,000 institutions of higher education to offer the education program.

In the past, the U.S. Department of Education has used this authority to conduct a growing number of experiments. Most recently, the Department invited institutions to participate in an experiment that will allow students taking college-credit courses to access federal Pell Grants as early as high school. Under that experiment, an estimated 10,000 high school students have the opportunity to access approximately \$20 million in Pell Grant aid to take dual enrollment courses provided by colleges and high schools throughout the nation.⁴⁸

IF THE NEW ACCREDITOR ELECTS TO BE RECOGNIZED BY THE U.S. SECRETARY OF EDUCATION, IT WOULD HAVE TO COMPLY WITH A SET OF REQUIREMENTS PRESCRIBED BY THE HIGHER EDUCATION ACT OF 1965 AND ITS IMPLEMENTING REGULATIONS UNLESS THE SECRETARY WAIVES THEM AS PER HER EXPERIMENTAL SITE AUTHORITY.

As per HEA's experimental site authority, the Secretary is waiving existing federal aid rules that prohibit high school students from accessing Pell Grants.

Most directly relevant to a possible teacher preparation experiment is the Educational Quality through Innovative Partnerships (EQUIP) Experiment the Department has begun. This experiment is intended to address a limitation on colleges and universities offering federal student aid to students enrolled in programs in which more than 50 percent or more of the content and instruction of program is provided by another unaccredited entity.⁴⁹ Under the EQUIP experiment, that limitation is waived allowing colleges and universities to curate coherent programs of study from one or more providers of postsecondary education and training.

To participate in EQUIP, applicants were to propose a partnership with at least one non-traditional provider of education and a third-party Quality Assurance Entity.⁵⁰ The Quality Assurance Entity is charged with independently reviewing and monitoring the quality of the program. Significantly, the Quality Assurance Entity is to hold the non-traditional provider and postsecondary institution accountable for student outcomes.

A similar experiment could be conducted with non-institutionally affiliated education programs offering teacher preparation services. Under this approach, a freestanding teacher preparation program would be permitted to participate in the federal student aid programs if they are reviewed and approved by a quality assurance entity that assesses the quality of the teacher preparation programs along several dimensions, including:

- The claims the teacher preparation program makes about what completers have learned and can do in the classroom; and
- The development of evidence to support those claims, including assessments of learning outcomes of those taught by program completers and that of associated employers.

Initially, the number of new providers to be permitted under this experiment should be limited to a relatively small number like 15, growing to 35 in the third year of the experiment to permit the design of a rigorous randomized control experiment consistent with the intent of the statutory authority outlined in HEA 487A(b)(3). Once the experiment has shown that the new teacher preparation program accretor is effective in identifying high-performing programs, the limit on the number of programs and the statutory requirement that the program be affiliated with an existing institution of higher education should be eliminated.

Such an approach would provide an opportunity to expand access to federal student financial aid in a narrow and easy to monitor arena with the ability to withdraw funds if approved programs fail to demonstrate efficacy. While this experiment would provide a significant benefit for the teacher preparation programs that gain access to federal student aid, it would also provide a significant benefit to the federal aid system overall by testing alternatives to the traditional input-oriented accreditation process. The testing of alternatives is exactly what the experimental sites authority was intended to permit. Ultimately, such an alternative approach might be shown to be more effective at identifying poor performing higher education providers permitting the federal government to move away from input-oriented reliance on accreditation for quality assurance.

In the future, the contemplated new teacher preparation program accreditor could charge users of its quality assurance services (i.e., employers, including states, school districts, and public charter school management organizations) fees to generate income to cover the cost of accreditation assessments. A new, outcome-oriented teacher preparation program accreditor could create an electronic pool of potential teacher candidates that participating school districts (or charter or private schools) could access. Such a database could contain detailed academic records, resumes, and sample videos of clinical practice for prospective graduates that elect to participate in the system. Only prospective graduates from an accredited institution or program of teacher preparation would be able to elect to participate in the database. Conceivably, participating teacher unions could be given access to this database as well, again for a fee, if the prospective graduate wishes to share their information with the union. The union could then seek out the prospective graduate to offer services and benefits to the teacher candidate.

Whether fees from these potential users of information on potential teacher candidates could generate the \$1.5 to \$2 million necessary to accredit teacher preparation programs is an open question.⁵¹ A great deal would depend on whether the new accreditor could quickly build relationships with states, school districts, and public charter school management organizations to build the capacity to measure new teacher impact on elementary and secondary student learning outcomes without the accreditor having to bear the cost of those systems.

Ultimately, ongoing financing is a matter of political will: do we want a teaching force that leaves our schools and programs of education ready to teach our most challenging students on day one, and if so, who is willing to pay for it?

Conclusion

The heart of the quality problem in teacher preparation and higher education in general is that the guardians of the system, accreditors, are financially dependent upon preparation program providers. Providers are averse to student outcomes-based measures of quality. And thus an opaque, unaccountable marketplace exists for consumers.

Dues, paid by member institutions of higher education that run existing teacher preparation programs, are the primary source of revenue for the main accreditor of teacher preparation programs. While accreditors like CAEP require institutions in punitive status for failing to meet mainly input-oriented standards to pay higher dues, they receive no revenue from institutions that are not accredited or are not

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FOX GUARDING
THE HEN HOUSE,
AND IT IS NOT WORKING.
A NEW GUARDIAN IS NEEDED.**

members of their accrediting association. As a result, accreditors have a strong incentive to hold poor performing institutions in a probationary or punitive status for extended periods of time without shutting down operation and to be careful as well not to identify too high a standard for all programs to meet.

Moreover, like many membership organizations, representatives of teacher preparation programs dominate the governing body of the main teacher preparation program accreditor. In fact, CAEP in particular is captive of the programs it accredits insofar as it depends on a vast group of volunteers – drawn from the programs it accredits – to participate in an input-driven and therefore labor-intensive accreditation review process.

In other words, the teacher preparation program accreditation is a system of the fox guarding the hen house, and it is not working. A new guardian is needed. The cartel of teacher preparation program providers needs to be broken open. New entrant and quality assurance metrics need to be expanded to focus on teacher candidate outcomes, rather than inputs. Results should be transparent and guide stakeholders stretching from prospective teacher candidates and their future employers to taxpayers and teacher preparation programs themselves that might self-improve.

Legislative, entrepreneurial, and executive action paths are all available to promote innovation and reform in the teacher preparation space. We submit the time for aggressive teacher education reform is now.

Endnotes

- 1 "California Education Funding Issues Survey," California School Boards Association, last modified May 2017, <https://www.csba.org/GovernanceAndPolicyResources/FairFunding/~media/CSBA/Files/GovernanceResources/EducationIssues/FairFunding/FundingPoll/051817PollingResults.ashx>; John O'Connor, "Americans Want Higher Standards, More Training For Teachers," State Impact, September 16, 2014, accessed July 1, 2017, <http://pdkpoll2015.pdkintl.org/559>.
- 2 Teach PLUS, "Teach Plus Teacher Preparation Poll Summary," (Boston: Teach PLUS, 2014).
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- 38 Estimates are based on the author Bergeron's review of Return of Organization Exempt From Tax (Form 990) for national, regional, and specialized accrediting agencies. Form 990s are available at www.guidestar.com. Among the accrediting agencies for which Form 990s were reviewed were the National Council for Accreditation of Teacher Education (NCATE), Teacher Education Accreditation Council (TEAC), the Council for the Accreditation of Educator Preparation (CAEP), the American Academy for Liberal Education (AALE), the Distance Education Accrediting Commission, the American Psychological Association, the Accrediting Council for Independent Colleges and Schools (ACICS), and the Higher Learning Commission. The estimate assumes that a new, independent 501(c)(3) nonprofit organization would not be created. Instead, a current nonprofit would establish a separate commission for teacher preparation programs. Since the new commission could rely on the knowledge and expertise of the nonprofit, substantially less research, development, and education would need to be done prior to the new accrediting commission reviewed and approved any teacher preparation programs. Likely, the existing accrediting commission likely already accredits institutions that host teacher preparation programs making it likely that the host organization already has substantial knowledge that can be applied to the work of the new commission.
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