

#### **ARGUMENTS & RESPONSES**

What evidence is there that teacher education programs vary that much in effectiveness – either with respect to K-12 student achievement or outcomes like placement and retention? Isn't it just a matter of whom the teacher education programs are enrolling?

- In recent years, several states have set up systems to track the results of their preparation programs.
  - In North Carolina, identified were teacher education programs with similar admission rates, similar missions, and similar cost of attendance pricing that produced new teachers with markedly different effectiveness levels (top quartile v. bottom quartile performance), particularly in secondary school mathematics.
  - In Tennessee, found were teacher preparation programs that produced graduates 2-3 times more likely to be in the top quintile of teachers in the state. The least effective programs produced graduates who were 2-3 times more likely to be in the bottom quintile.
  - In Louisiana, identified were teacher education programs that prepared new English language arts teachers found to be as effective or more effective in terms of generating K-12 student growth as long-experienced English language arts teachers.
  - In Washington State, differences in retention rates across preparation programs were found to equal as much as 4-5 percentage points.
- Some programs may be doing a better job recruiting high-performing candidates, some may be doing a better job developing their students' skills, and some may be more responsibly preparing candidates based on labor-market needs. Many programs may need to improve in one or more of these areas. But the ultimate measure of a program's quality is whether it is placing teachers in the classroom who teach effectively. Admission and student body demography is not destiny in teacher education or anywhere else in education.

The American Statistical Association (ASA) says "aspects of educational effectiveness that are within a teacher's control represent a small part of the total variation in student test scores or growth; most estimates in the literature attribute between 1% and 14% of the total variability to teachers." Why, given the leap required to evaluate teachers based on student test scores, should we make an even bigger leap and use student standardized test scores to evaluate the programs in which teachers were trained?

- As Raj Chetty, John Friedman, and Jonah Rockoff authors of one of the leading studies on teacher quality impact put it, "the fact there is a lot of variance in student achievement due to numerous factors such as parents, neighborhoods, or health does not take away from the important role that teachers can and do play in improving students' outcomes." It's true the majority of variation in student test scores is attributable to factors outside of the average teacher's control, but that's not the same thing as saying that teachers have no effect on students. If it were, why even have teachers?
- While a teacher's preparation program is only one factor that contributes to student growth, researchers have found that where a teacher was trained does have an effect on student achievement. According to Dan Goldhaber's research, funded by Carnegie Foundation, in Washington State, the top performing teacher preparation programs produce new teachers who raise K-12 student achievement by an average amount that is roughly equivalent to reducing class sizes by 5-10 students.

• In a more recent statement than ASA's, the American Psychological Association says it's possible to ascertain teacher preparation program effects on ultimate K-12 student learning, and goes further saying that "state and federal governments should *require* that teacher preparation programs have strong, affirmative, empirical evidence of the positive impact of their graduates on student learning." Tennessee recently announced that they plan to do just that as a condition of state program approval.

#### Most teachers learn on the job. Shouldn't we care more about their first year experience than their prep program? No school of education can replicate the rigors of the first year of teaching.

- If we want to raise student achievement, we need teachers to be ready on day one in the classroom. A generation ago if you asked a classroom teacher how long they've been teaching, the most common answer you would get would be fifteen years. Today, the most common answer you get is one year. The next most common answer you get is two years.
- It cannot be emphasized enough that teacher education reform is an education equity mandate. Rookie teachers disproportionately teach low-income and racial minority students in high-poverty schools. Year-after-year and grade-after-grade, low-income and minority students are taught by a stream of novice teachers. As a matter of educational equity and in furtherance of socioeconomic mobility, we need rookie teachers to be ready on day one to teach all students successfully to high standards. Right now, research and survey data indicate that all too many are underprepared.

### The Colleges of Teacher Education Association says the Obama administration's teacher education accountability proposal hurts students and punishes under-resourced programs. True?

- First, there's effectively a grandfather clause associated with the Obama plan because of the long leadtime to implementation. Realistically, no current teacher candidate will be affected by any proposed federal consequences. Programs that repeatedly fail to meet new teacher education accountability standards do not lose eligibility to receive TEACH Grants until 2020-2021.
- Second, the 'punishing students' riff is the same argument some of the worst for-profit schools made against the Obama Administration's gainful employment regulation. Let's be clear. We are not doing teacher candidates any favors by implicitly encouraging them to attend terrible academic programs likely to leave them with mounds of student loan debt and no degree or without the skills needed to get and keep a good job necessary to pay down that debt. Poor quality, rip-off teacher education programs are harming postsecondary and K-12 students.

### The Obama Administration is going to link state evaluation of teacher education programs quality to TEACH Grant aid eligibility. Won't restricting TEACH Grants lead students to take on more debt?

- There are a host of problems with TEACH Grants. In fact, they're really loans.
  - The field calls TEACH Grants "gr-oans," because they're grants that turn into loans if a variety of student requirements are not met after initial conferral.
  - The Department of Education estimates a 75% rate of conversion of TEACH Grants into interest-bearing, unsubsidized student loans.
  - TEACH Grants or "gr-oans" displace institutional grant aid, real grant aid that could have been awarded and wasn't due to the presence of TEACH Grants in the relevant student's financial aid package.

- Currently, and despite a clear statutory directive, there's virtually no connection between TEACH Grant eligibility and program quality. In fact, two-thirds of the ridiculously small percentage of teacher prep programs identified as low-performing and at-risk are at institutions deemed eligible to award TEACH Grants even though the statute says they're only supposed to go to "high quality" programs. See Section 420L(1)(A) of the HEA of 1965.
- The sooner the Department of Education limits TEACH Grants to high quality programs as the statute directs, the better. If the 2020-2021 school year is as soon as responsibly possible, then so be it. But that should be our standard: as soon as responsibly possible.

#### Won't the Administration's proposed teacher education regulatory changes undermine diversity in our teaching workforce?

- The teaching force would benefit from greater diversity. Approximately, 38% of students identify as black or Hispanic, while only 14% of our teachers do. Only 2% of teachers are African-American males.
- We need a more diverse and more effective teaching force overall. We do all of our students, particularly low-income and minority K-12 students who are more likely to be taught by novice teachers, a profound disservice when we allow persistently low-performing teacher preparation programs to continue to license new teachers. These programs should be assisted in improving, or ultimately shut down, by states.

## The Administration is doubling down on high-stakes testing. Doesn't it make more sense to hold teacher preparation programs accountable for things they can control, like teacher education program coursework and clinical experience (i.e. student teaching), as opposed to things they can't control like K-12 student test scores?

- Teacher education programs should be held accountable based on multiple measures of which associated K-12 student achievement should be only one. In fact, the draft regulation requires states to hold teacher preparation programs accountable based on multiple measures of success. One measure is teacher preparation program graduate success as reflected in either: (a) improved K-12 student growth based on, yes, test scores, or (b) teacher evaluation results that consider K-12 student growth, among other factors. But in addition, there are other measures to be considered in evaluating teacher preparation program effectiveness including teacher candidate placement in high need subjects and schools, teacher candidate satisfaction with program quality, employer satisfaction with teacher candidate training, and any other measure states deem appropriate.
- States are given discretion to determine how much weight is to be accorded to each measure of teacher preparation program quality. Moreover, in addition to outcome measures, States are also to assess teacher preparation programs based on input measures such as coursework content, the nature of clinical experience provided, or possession of approval from peer-led accrediting agency. The bottom line is it's a red-herring to claim the proposed policy would measure teacher training program quality based simply, or even in majority part, by looking only at K-12 standardized test scores.
- States like Louisiana and Tennessee and respected researchers like Dan Goldhaber, George Noell, and Gary Henry separately have established proof points that it is possible to measure the outcomes of teacher preparation programs. In fact, their research suggests some teacher preparation programs consistently produce new teachers who are more effective than those trained by other preparation programs in the same state. Noell's research indicates there are preparation programs that produce candidates who even in their first year on the job are as effective as the average veteran teacher.

What about untested grades and untested subjects? How do you hold a teacher preparation program accountable for the outcomes of an art teacher or a teacher candidate who goes to work in a different state – like 40 percent of them do?

- For subjects like art, the draft regulation allows states to look at student results on local pre-tests of ability, end-of-course tests, and objective performance-based assessments; assessments against locally-determined student learning objectives; student performance on English language proficiency assessments; and other measures of student achievement that are rigorous and comparable across schools within a school district.
- For most teacher training programs, a majority of candidates go on to work in state. At the very least, we should look at those teachers, be they in tested-grades and subjects or beyond, in assessing teacher education program quality.
- The draft regulation gives states the opportunity to include teachers who go on to teach out of state, if they wish. In fact, the long-lead implementation timeline associated with the Education Department's regulation should facilitate cross-state examination.

#### Isn't this an unfunded mandate? Do states have the capacity to take on this extra work? How much will it cost? Who is going to pay for it?

- It's important to keep in mind that a number of states are already doing this Louisiana and Tennessee are leading examples. Researchers in North Carolina and Washington State have done it. According to the Data Quality Campaign (DQC), the vast majority of states already have data systems that match K-12 student achievement to teachers; that match teachers to their preparation programs; and that track data on teacher job placements. They just need to put the data together. DQC does an annual survey of where states stand in terms of progress.
- Louisiana state leaders have said they put together the data for approximately \$100,000 a year. Tennessee uses an outside contractor and spends a little more, but it's still a relatively small cost in relation to a state's budget. And of course the federal government already provided states almost \$600 million under the Recovery Act to develop state longitudinal data systems.

### Some have called for a new and better teacher licensure system – a bar exam for teachers. Wouldn't that be better than this corporate, test and punish, No Child Left Behind-like system the Administration is seeking to impose on higher education?

- Use of terms like "corporate education reform" and "No Child Left Behind" are poll-tested efforts to smear education policies focused on student learning outcomes with which one might disagree regardless of their substantive merit.
- From a policy standpoint, creating a feedback loop between K-12 and higher education empowers teacher preparation programs to identify areas for improvement and self-correct. It's anti-intellectual, anti-education, and anti-progressive to not make use of data that can be used to improve teaching and student learning.
- A new national bar exam for teachers that leads to cross jurisdiction certification is a good idea if and only if that exam is proven to have predictive validity in improving K-12 student outcomes. Otherwise, it's just another new test of theoretical as opposed to proven benefit. We should map back K-12 student learning outcomes to teacher certification exams and teacher preparation programs to validate and improve both.

Is it fair to deny a student access to a financial aid opportunity they currently enjoy – TEACH grants – because they didn't attend the right program or live in the right state?

- First, the Administration's draft regulation effectively grandfathers teacher candidates who already have been awarded a TEACH grant. Second, keep in mind that currently those TEACH grant recipients who do not successfully go on to teach in a high need subject in a high need area for a number of years have their "grants" converted into interest-bearing loans. Investing federal funds in teacher preparation programs likely to produce that outcome for teacher candidates is a sucker-punch. The teacher candidate ends up with a "gr-oan" (a grant that turns into a loan) and misses out on other institutional grant aid for which he or she might have been eligible instead.
- According to the Higher Education Act statute, the TEACH grant program was created to benefit low-income students attending "high quality" teacher preparation programs, not any and every teacher preparation program regardless of quality.
- Regardless, all post-secondary students continue to have access to Income Based Repayment and Public Service Loan Forgiveness. There are no new conditions on eligibility for traditional Title IV Pell Grant aid and the like.

# Title II of the Higher Education Act lays out several reporting requirements and the indicators of quality that the Administration is talking about – student learning, job placement and retention, surveys of graduates and principals – aren't among them. Is the Administration exceeding its regulatory authority?

- The Secretary of Education has authority to add and remove a number of reporting requirements and a statutory mandate to ensure uniform definitions and methods of collection. Hopefully, he will eliminate institution-reporting requirements on program inputs that are of little value and replace them with fewer, more meaningful requirements on program outcomes. The result should be less and better reporting.
- Title II of the Higher Education Act requires states to conduct an assessment of teacher preparation programs in their state and identify and improve the lowest-performers. Right now with no regulatory guidance, it isn't happening. Of the more than 13,000 teacher education programs at approximately 1,500 institutions of higher education nationwide, states in 2012 identified less than 1% as low-performing. A shocking 27 states never have identified a single low-performing or at-risk teacher education program. Past state assessments of teacher education programs have not addressed the key question of whether a program is successful in preparing and placing teachers who get results for their students.
- "Outcome-oriented" data on teacher education program effectiveness will support stronger state systems of accountability and facilitate greater self-improvement within the field. According to the Data Quality Campaign, most states have the capacity to link teacher performance data with teacher preparation programs, but only a handful of states have yet to make that information available. Soon they'll have to do so.

#### Looks like a pretty long lead-time. Why is the Administration putting off consequences? Might the next administration just erase these regulations?

• A new administration can change any number of regulations, regardless of effectiveness date. But from a technical standpoint, it makes sense to pace full implementation of the accountability metrics until after common core, associated assessment, and teacher evaluation related implementation timelines are met to ensure full valuation of teacher education program impact on K-12 student achievement.

- We've seen in the gainful employment context that just setting in motion an accountability policy prompts sector improvements. Proprietary schools have increased their investment in instruction as opposed to sales and marketing, embraced trial periods, curbed some of their most unethical recruitment practices, and slowed enrollment in programs that are unlikely to lead to employment in the relevant field of study. Hopefully, the Obama Administration's teacher education accountability policy will inspire universities to stop treating schools of education as cash cows and instead provide them with greater resources to do their job effectively.
- A deliberate lead-time years facilitates accountability based on new standards and assessments and cross-state collaboration. It also creates an implicit grandfather clause with respect to any link to institution TEACH Grant eligibility.
- By putting out an extended implementation timeline, the administration is hopefully nudging as opposed to dragging states into holding teacher education programs accountable for student outcomes. That should inspire pre-emptive teacher education program improvements and lead to well thought-out state accountability systems.

## Doesn't the STEM teacher training program exemption undermine the entire regulation? Why not have other exceptions for teacher training programs focused on English as a Second Language, special education, rural education, or programs at Historically Black Colleges and Universities?

- We should raise quality standards and outcome expectations for all teacher education programs.
- Higher standards for math and science teacher training is the way to compete successfully with China and other global competitors. This is a draft regulation. There is an opportunity for comment and revision. Expect comment from education reform advocates on this among other areas.