



# REVIEW OF PROPOSED 2015 FEDERAL TEACHER PREPARATION REGULATIONS

*Reviewed By*

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## Summary of Review

On December 3, 2014, the U.S. Department of Education released a draft of proposed new Teacher Preparation Regulations under Title II of the Higher Education Act with a call for public comments within 60 days. The proposal enumerates federally mandated but state-enforced regulations of all teacher preparation programs. Specifically, it requires states to assess and rate every teacher preparation program every year with four Performance Assessment Levels (exceptional, effective, at-risk, and low-performing), and states must provide technical assistance to “low-performing” programs. “Low-performing” institutions and programs that do not show improvement may lose state approval, state funding, and federal student financial aid. This review considers the evidentiary support for the proposed regulations and identifies seven concerns: (1) an underestimation of what could be a quite high and unnecessary cost and burden; (2) an unfounded attribution of educational inequities to individual teachers rather than to root systemic causes; (3) an improperly narrow definition of teacher classroom readiness; (4) a reliance on scientifically discredited processes of test-based accountability and value-added measures for data analysis; (5) inaccurate causal explanations that will put into place a disincentive for teachers to work in high-needs schools; (6) a restriction on the accessibility of federal student financial aid and thus a limiting of pathways into the teaching profession; and (7) an unwarranted, narrow, and harmful view of the very purposes of education.

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# REVIEW OF PROPOSED 2015 FEDERAL TEACHER PREPARATION REGULATIONS

*Kevin K. Kumashiro, University of San Francisco*

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## I. Introduction

Like no other time in our nation's history, the preparation of public school teachers is front-and-center in both national and statewide policy considerations. University-based teacher preparation programs, in particular, are under increased scrutiny and criticism, particularly from top policymakers, education leaders, and the media. Consistent throughout are messages that the problem is the existence of too many "mediocre" programs, and that the solution is to implement market-based "reforms" that may sound commonsensical but, on the whole, lack a sound research base. For example:

- In 2009 U.S. Secretary of Education Arne Duncan stated in a highly publicized speech at Columbia University: "By almost any standard, many if not most of the nation's 1,450 schools, colleges, and departments of education are doing a mediocre job of preparing teachers for the realities of the 21st century classroom."<sup>1</sup> He continues to repeat this claim, but provides no factual base for the assertion.
- The new U.S. Undersecretary for Postsecondary Education, who has oversight for teacher preparation, Ted Mitchell, is the founder and director of the New Schools Venture Fund. In recent years, this fund led initiatives that promote deregulation and market-based policies in teacher preparation (and funded the California Superior Court lawsuit of *Vergara v California* that is widely viewed as undermining teacher protection laws).<sup>2</sup>
- In 2013 and again in 2014, the National Council on Teacher Quality (NCTQ), in partnership with *U.S. News and World Report*, conducted an assessment of more than 1,000 teacher preparation programs across the nation. With criteria and review processes that contrasted starkly with professionally recognized national accrediting agencies such as the National Council for Accreditation of Teacher Education,<sup>3</sup> NCTQ issued report cards that publicly proclaim almost all teacher preparation programs to be failing.<sup>4</sup> These reports were issued despite validity objections by such professional associations as the American Association of Colleges of Teacher Education.<sup>5</sup>
- In 2012, the Council of Chief State School Officers convened a task force consisting of representatives of the CCSSO, the National Association of State Boards of

Education, and the National Governors Association, but did not include teacher educators themselves. This task force recommended 10 action steps that fell within three state-specific policy levers of licensure; program approval; and data collection, analysis, and reporting.<sup>6</sup> Currently, a majority of states have indicated a willingness to implement these recommendations, and seven states are participating in a two-year pilot known as the Network for Transforming Educator Preparation. Included in the recommendations are the high-stakes use of performance assessments like the edTPA (the Pearson-administered Teacher Performance Assessment), and the rating of teacher preparation programs using outcomes data on the students of the teachers who graduate from the programs.

## Federal Teacher Preparation Rule-Making Initiatives

In this political, media, and advocacy context, the U.S. Department of Education in spring 2012 put forward a draft of its proposed teacher preparation regulations for “negotiated rulemaking” in order to marshal support from key constituent groups. This process was not successful.<sup>7</sup> On December 3, 2014, the Department released a new draft, slightly different in substance from the first, in its “Notice of Proposed Rule Making.” The U.S. Department of Education website contains a number of summary materials, including a 2-page overview and a 29-page PowerPoint overview.<sup>8</sup> The Federal Register<sup>9</sup> contains the full text of the proposed regulations.

- **By February 2, 2015**, the Department requests comments from the public (to be submitted online at <https://federalregister.gov/a/2014-28218>) on any or all of the content of the proposed regulations.
- **By January 2, 2015**, the federal Office of Management and Budget (OMB) requested comments sent separately (via email to [OIRA\\_DOCKET@omb.eop.gov](mailto:OIRA_DOCKET@omb.eop.gov)) on the cost and burden of implementing these regulations, so that it could prepare its response to the Department.

## II. Summary of the Proposed Regulations

The implicit foundation of the “mediocrity” of teacher preparation programs and the aim of holding these programs accountable for raising student test scores are the most controversial features of the proposed rules.

Within the dense bureaucratic language of the 74 pages of proposed rules resides a fundamental re-orientation of the nation’s 25,000 teacher preparation programs. All states receiving federal funding under the Higher Education Act are affected, which means that all teacher preparation programs in every state, including programs that offer alternative routes to initial licensure outside of institutions of higher education (that is, non-university-based teacher preparation programs), are affected as well.

The scope is more formally defined in the Federal Register:

The Secretary proposes new regulations to implement requirements for the teacher preparation program accountability system under title II of the Higher Education Act of 1965, as amended (HEA), that would result in the development and distribution of more meaningful data on teacher preparation program quality (title II reporting system). The Secretary also proposes to amend the regulations governing the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program under title IV of the HEA so as to condition TEACH Grant program funding on teacher preparation program quality and to update, clarify, and improve the current regulations and align them with title II reporting system data.<sup>10</sup>

What does this mean in practice? The proposed teacher preparation regulations center on federally mandated but state-enforced definitions of program quality and regulation of all teacher preparation programs. Specifically, they require states to assess and rate every teacher preparation program every year with four Performance Assessment Levels (exceptional, effective, at-risk, and low-performing), and states must provide technical assistance to “low-performing” programs. Institutions or programs determined to be low-performing may lose state approval, state funding, and federal student financial aid.

The rating is to be based on four indicators or performance outcomes, not all of which are weighted equally, and gives states some flexibility in determining the substance and the measurement of these outcomes. The four outcomes are:

- student learning outcomes (aggregate learning of the students in the classrooms of the program’s graduates, consisting primarily of student growth or gains in test scores),
- employment outcomes (placement and retention rates of program graduates, particularly in high-needs schools),
- survey outcomes (perceptions of the program by graduates and by employers), and
- accreditation (by the Council for the Accreditation of Educator Preparation [CAEP], or by the state with certain criteria as prescribed in the regulations, including curriculum content, clinical experiences, and entry/exit qualifications).

In application, “student learning outcomes” will be calculated primarily by standardized-test-based value-added measures (VAMs), and programs will need to track graduates for several years after graduation and to develop longitudinal data-collection systems.

The proposed timeline for the implementation of these regulations is:

- By September 2015 the teacher preparation regulations would be finalized.

- In 2015-16 states would design the data management systems necessary for the performance ratings, and in subsequent years, states and institutions or programs would engage in data collection and analysis.
- The reporting would emerge in stages, with pilot Institutional Report Cards in October 2017 and pilot State Report Cards in April 2018 that move states toward public reporting of performance outcomes of each institution or program; that would be in addition to current Title II reporting requirements.
- In April 2019 states would be required to rate all teacher preparation programs, and starting in July 2020 all institutions' eligibility for TEACH grants would be affected by these ratings.

### III. Analysis of Key Issues in the Proposed Regulations

Improving teacher quality and teacher preparation should be a process that engages key constituents and communities and draws on both scholarly and practical expertise. The proposed regulations have not emerged from an inclusive, democratic decision-making process, or from the substantive involvement of qualified experts, or from sound research. Many of the most contentious elements that derailed the spring 2012 “negotiated rulemaking” were challenged precisely because they were not supported by research (including the problematic definitions of performance outcomes and use of value-added measures), but they remain in the proposed regulations.

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Additionally, the regulations reflect an historic overreach of the federal government through regulation, in at least three ways: the proposed regulations extend the reach of the federal government into what is currently the domain of states (program approval) and institutions (academic affairs); the proposed regulations extend to all states what is currently required only of states who received Race to the Top funding or ESEA waivers; and the proposed regulations make significant policy changes without substantive and inclusive deliberation with either the profession or Congress.

The following discussion points are meant as a tool to assist readers in framing their own thoughts and comments on the key issues in order to respond to the Department's call for public comments by the deadline of February 2, 2015. They are not meant as comments upon any particular political organization, party, or philosophy.

**1. The proposed regulations will likely burden institutions with cost and labor that is higher than estimated, which could constitute an expensive unfunded mandate.**

Included in the regulations is a separate and more immediate request for public comments to the Office of Management and Budget (OMB) specifically about the estimated cost and burden of implementation. There is no federal funding to implement these regulations, but because the economic impact is expected to exceed the \$100 million threshold for greater scrutiny by the OMB, the OMB must provide feedback to the Department. The regulations estimate the total cost for implementation to be \$42.1 million over 10 years, and details the estimates of cost and labor in pages 71858-71884.

The regulations claim that no new data are needed for student growth and for value-added modeling and that only a few hours of labor will be needed for each of the components. The regulations inaccurately presume that states and institutions are already collecting much of this data or can easily do so, such as by tracking the placement and retention of graduates for years after graduation; by gathering student test scores and tying them to specific teachers and, in turn, tracing them back to institutions; and by gathering qualitative feedback from graduates and employers years after graduation. The regulations' estimated cost for all of the nation's higher education institutions is \$3.7 million annually, which appears to be grossly insufficient to hire additional staff and create and administer new data-collection instruments and data-management systems for every institution in every state every year. Creating and administering such systems and processes would certainly be costly and would disproportionately affect the public universities that prepare large numbers of public-school teachers.

If such data were useful for evaluating institutions or programs, the cost and burden might be warranted, but such utility has not been demonstrated, as is addressed below. Such data do not provide a scientifically acceptable basis for rating the performance of programs, and therefore, even if the cost and burden were low, such expense would not be justified.

Furthermore, although the analysis of cost and burden focuses primarily on the role of states and institutions, it should be noted that principals and district leaders will be affected as well. For the teachers within their first few years of hire, principals and district leaders will be responsible for annually validating student growth and completing surveys of teacher effectiveness and program preparation. This load is particularly significant in high-needs schools and areas where high teacher-turnover rates translate into large numbers of new teachers every year.

**2. The proposed regulations inaccurately conceptualize the impact and the preparedness of teachers as independent of larger systems.**

This happens in two ways:

**a. The proposed regulations inaccurately ascribe educational inequities and inadequacies to individual teachers, and in so doing, obscure paramount systemic flaws in education and in society.**

The regulations rightly point to research that shows how teachers matter and that individual teachers can have significant impact on the learning and success of their students. But the regulations inaccurately infer that the reverse and inverse are true: namely, that student learning is solely the result of having an effective teacher, and that the lack of student learning is solely the result of having an ineffective teacher. Furthermore, the regulations trace this causal chain back one more step to the effectiveness of the program that prepared the teacher.

Besides being indefensible science and social policy, this is not how professional preparation programs are properly evaluated. Medical schools, for example, are not evaluated by tracking graduates to aggregate the wellness of their patients, because patient wellness is affected by a range of other factors, including patient and family history, health care access, the economy of food and nutrition, environmental conditions, cultural influences, and so on. These matters are far beyond the control of physicians. So, too, with teachers. Blaming teachers and teacher-preparation programs masks the much larger, systemic problems in public education and society. The Department should treat teacher quality and preparation as inseparable from structural and systemic factors that affect student learning and success. It should reframe the conversation toward addressing such systemic and well-documented problems as racial segregation, inequitable funding, narrowed and disconnected curriculum, flawed assessments and use of assessments, undemocratic governance, strains on community capacity, and other factors with far stronger established links to school success.<sup>11</sup>

**b. The proposed regulations define the goal of classroom readiness too narrowly.**

The regulations rightly point to research that shows that new teachers feel ill-prepared to deal with the realities of classrooms, including in areas such as behavior management and differentiated instruction. However, the regulations inaccurately infer that teacher preparation programs are failing because their graduates are unable to perform as effectively as a teacher with multiple years of accumulated wisdom. Such a narrow definition of readiness is not the goal of pre-service preparation in other professions. New physicians are expected to gradually progress under the guidance of mentors from interns or apprentices to independent practitioners. This narrow definition of readiness is also not the goal of pre-service

preparation of teachers in high-performing school systems in other countries, such as Japan and Finland. Elsewhere, preparation programs work in concert with schools and the profession to develop institutional structures and professional cultures that support working in teams to develop their teaching skills and have an impact on students.<sup>12</sup> The Department should view the goal of classroom readiness within a more holistic, developmental, and collective framework, and should evaluate and support teacher preparation programs accordingly.

### **3. The proposed regulations mandate the evaluation and weighting of outcomes that are narrow at best, and misleading at worst.**

As noted earlier, the regulations require states to rate institutions and programs based on four indicators: student learning outcomes, employment outcomes, survey outcomes, and accreditation. The two most prominent outcomes are also the most problematic:

#### **a. The proposed regulations rely on a test-based accountability framework and on value-added measures for data analysis, which are scientifically inadequate and discredited processes for decision-making in education.**

The regulations require evidence of student learning in the classrooms of the program graduates when evaluating teacher preparation programs. The regulations claim that the evaluations need not be over-determined by value-added measures (VAMs), which purport to link gains in student achievement (i.e., increases in student test scores) to the teacher, and in turn, to the program that prepared the teacher. However, the reality is that VAMs will drive determinations of teacher effectiveness. This will happen in two ways. First, although the regulations appear to give options, in reality they give no realistic option aside from VAMs. The regulations allow for student learning to be assessed in one of two ways: student growth (which includes the use of VAMs) and teacher evaluations (which a careful read reveals to be based in large part on student growth). Therefore, regardless of the method of assessment, student growth (including VAMs) is a significant factor. Second, the current VAM requirement within Race to the Top and NCLB waivers, along with companion state-level legislative action, create a context in which districts are compelled to use VAMs.

This reliance on VAMs would not be a problem if they proved valid and reliable for decision-making, but research clearly does not support the use of VAMs to make high-stakes decisions about teacher quality and teacher-preparation program quality. The idea seems commonsensical: value-added measures are ways of looking at whether a student's achievement goes up over a period of time, and if we account for all other factors, we should be able to attribute those gains to the teachers that they had, and in turn, the programs that prepared those teachers. But several leading research organizations, including the American Educational Research Association, American Statistical Association, National Academy of Education, and National Research Council,<sup>13</sup> as well as

collectives of education scholars across the nation,<sup>14</sup> have issued statements that warn against using VAMs to make high-stakes decisions. They are neither valid nor reliable for such decisions. Extending this causal logic to the institutions that prepare those teachers is to compound, not resolve, the problems.

**b. The proposed regulations rely on inaccurate causal explanations for placement and retention that may dissuade institutions from helping to place their graduates in high-needs schools, content areas, and communities.**

The indicator of employment outcomes inaccurately presumes that placement and retention are the result of program quality, without sufficient acknowledgment of the role of the job economy, work conditions, personal life circumstances, and preferences that can affect employment and tenure. The impact of a teacher on student learning cannot be accurately explained without including the challenges of teaching in schools with insufficient resources, high teacher turnover, low student retention, high levels of violence, and high numbers of students with special needs, students in distress, and student populations that are underserved and marginalized because of poverty, racial inequities, healthcare access, and so on.<sup>15</sup> As a result, although the regulations prioritize the placement and retention of new teachers in high-needs schools, if the teacher preparation program is judged on the test scores of high-needs students, it creates an obvious disincentive to place their students in these schools.

There are three related concerns. First, the goal of placing new teachers in high-needs schools without creating additional support systems contradicts the goal within ESEA of more evenly staffing high-needs schools with both new and experienced teachers.

Second, not all teacher preparation programs are treated equally in this indicator. The method for calculating rates of placement and retention is prescribed for higher education institutions but can be calculated differently for providers of alternative routes to certification. Whether there is equality between these pathways is unknown.

Third, state universities and institutions serving minorities may be disproportionately affected because they prepare large numbers of teachers in high-needs schools. The Department should develop more appropriate and equitable indicators of student learning that encourage, rather than dissuade, working in high-needs schools and contexts.

**4. The proposed regulations negatively affect federal funding for students in financial need, thereby restricting their access to the teaching profession, particularly for underrepresented groups.**

Institutions and programs judged to be low-performing may lose state approval, state funding, and federal student financial aid, including eligibility for students in

those programs for the HEA Title IV student aid program known as the Teacher Education Assistance for College and Higher Education (TEACH) grants. Currently, this is a \$100 million program that targets students in financial need who commit to teach in high-needs areas. One of the intended outcomes of these regulations is to reduce the number of “low-performing” institutions and programs in which students receive TEACH grants. By reducing the number of institutions in which students are eligible for federal funding, the proposed regulations will further reduce the accessibility of higher education and teacher preparation programs for low-income students, many of whom are students of color, and many of whom are underrepresented in the teaching profession.<sup>16</sup> The Department should continue to determine student aid eligibility based on student need, not on institutional ratings that lack a sound research base.

**5. Overall, the proposed regulations presume a narrow and diminished view of the purposes of public education.**

Within the proposed regulations, student learning is presumed to be marked by high test scores; teaching is presumed to be the raising of test scores; and teacher preparation is presumed to enable teachers to increase test scores. But, as commonly agreed, this is not the end goal of education. If, as John Dewey said, the purpose of education is to strengthen our democratic society,<sup>17</sup> then the proposed regulations should expand and enrich, not narrow and limit, how the nation thinks about and advances the promises and purposes of public education. Instead of test score gains, the rules could push states, professions, districts, and institutions and programs to think deeply about what it means to prepare the next generation to advance the principles and promises of a democratic nation, what it means to prepare every child to flourish in life,<sup>18</sup> and what it means to address public education’s own troubled history of maintaining societal inequities even when purporting to provide equal educational opportunity for all.<sup>19</sup> The Department should lead the country in imagining and building a public school system, a teaching profession, and the teacher preparation programs that serve them in ways that truly improve education and society.

## IV. Conclusions

Readers are encouraged to review the proposed rules at the web address provided below and to submit their own comments. The Department looks not only at the content but also at the number of comments submitted and at which components of the proposed regulations are addressed. The deadline for comments is February 2, 2015. Comments can be submitted via a weblink to “Submit a Formal Comment” on the Federal Register website (<https://federalregister.gov/a/2014-28218>).

## Notes and References

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1 See, for example:

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3 See:

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9 Office of the Federal Register (2014). *Teacher preparation issues*. Retrieved Dec. 28, 2014, from <https://www.federalregister.gov/articles/2014/12/03/2014-28218/teacher-preparation-issues>.

10 See the “Summary of Proposed Changes” (p. 71819) in:

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11 See:

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