



PENDING REGULATIONS ON TEACHER PREPARATION PROGRAMS

Background

- UNCF is the nation's largest minority education organization, with 70 years of experience in increasing college access and opportunity for minority students. We are best known by our motto – “A mind is a terrible thing to waste®.” UNCF carries out this mission through our 37 member private Historically Black Colleges and Universities (HBCUs) and our unique role in administering nearly 400 minority scholarship programs, the largest of which is the Bill and Melinda Gates Foundation Millennium Scholars Program.
- HBCUs have a historic tradition in teacher education and are uniquely positioned to lead in preparing underrepresented minority teachers and administrators. Most HBCUs were established in the mid to late 1800's as pre-collegiate schools for newly freed slaves and normal schools for training teachers. Graduates of the nation's public and private HBCUs – who primarily are first-generation, low-income and African American college graduates – today account for about half of all African-American teachers in public schools.ⁱ In the 2011- 2012 academic year, 72 HBCUs enrolled nearly 19,000 teacher candidates and graduated approximately 2,300 students with education degrees, making a significant contribution to a skilled and more diverse teaching workforce.ⁱⁱ
- Increasing the number of effective minority teachers, particularly for high-need schools, is a key strategy for closing the achievement gap between minority students and their non-minority peers.
- UNCF is greatly concerned about the potential negative impact of the pending teacher preparation program regulations on HBCUs, their teacher training programs and teacher graduates.

Key Points

- **The pending regulations could hurt efforts to close the diversity gap within the nation's teacher workforce.** A greater number of teachers of color are and will be needed to provide role models and culturally competent teachers for an increasingly diverse K-12 student population. This fall, students of color are projected to comprise

more than half (51%) of the total K-12 public school population and this proportion is expected to grow to 55% by 2022.ⁱⁱⁱ

While K-12 classrooms are becoming more ethnically diverse, the teaching profession has not followed the same trend. In the 2011-12 academic year, only 18% of the 3.4 million elementary and secondary public school teachers in the United States were teachers of color, and almost every state had a large teacher diversity gap.^{iv}

HBCU teacher graduates are more likely to work and remain in high-poverty, hard-to-staff urban schools and they face greater challenges in achieving student growth as measured by standardized test scores.^v There is substantial research indicating that student achievement can be affected by such factors as home and community supports; school factors such as class size, level of educational resources, and differential summer learning loss, which especially affects low-income children.^{vi} Thus, HBCU teacher preparation programs are disadvantaged by value-added methods that fail to control for these factors, more vulnerable to being deemed “low performing” and at a greater risk of loss of essential Title IV student aid under the pending regulations.

- **Assessment of the quality of teacher preparation programs should be based on research that is current, valid, and reliable.** Our member institutions believe it is inappropriate to rate teacher training programs using student growth measures that have not been determined to be valid or reliable for this purpose. Respected researchers have concluded that value-added models that are designed to evaluate the effectiveness of teachers in the classroom are not appropriate as a primary measure of evaluating individual teachers. Such methods are even less developed as a valid means of measuring the quality of teacher preparation programs.^{vii}
- **UNCF opposes using teacher program performance ratings to determine eligibility for TEACH Grants or other Title IV student aid programs.** Such a high-stakes rating system would fundamentally change a critical aspect of federal student financial aid policy, which for nearly 50 years has reflected the tenet that federal student assistance should be based on financial need, not on institutional characteristics.

Allocating TEACH Grants or other Title IV student aid programs based on teacher preparation program performance ratings could create perverse incentives to limit enrollment of students of color and students with limited means in teacher training programs and, thus, undermine the very students that Title IV student aid is designed to help.

Further, such a system could deny access to teacher training programs for students who choose to stay near their home communities if this access is cut off due to training programs in their local communities being deemed “low performing.”

- **New voluntary accreditation standards for teacher preparation programs are being phased in based on rigorous professional standards by a new accrediting body, the Council for Accreditation of Education Preparation (CAEP).** The federal

government should give these voluntary standards a chance to work, rather than layering new federal requirements on states and institutions on top of tougher accreditation standards.^{viii} Many states and HBCUs, particularly smaller institutions, do not have the capacity to comply with extensive and costly new regulatory requirements, such as conducting surveys of program graduates and their employers.

- **Finally, strengthening both financial and technical supports for under-resourced HBCUs would help to equalize their opportunity to compete on a level playing field, expand capacity to train additional teachers of color, and excel under new guidelines and elevated expectations.** UNCF urges the Obama Administration to assist HBCUs in addressing any new accountability measures by supporting and funding the Augustus F. Hawkins Centers of Excellence program, authorized in the Higher Education Act.

Endnotes:

ⁱ See <http://diverseeducation.com/article/12628/>.

ⁱⁱ Data extracted from the U.S. Department of Education's Integrated Postsecondary Education System by the UNCF Patterson Research Institute.

ⁱⁱⁱ U.S. Department of Education, National Center for Education Statistics. 2014. *Projections of Education Statistics to 2022*.

^{iv} U.S. Department of Education, National Center for Education Statistics. 2013. *Characteristics of Public and Private Elementary and Secondary School Teachers in the United States: Results from the 2011-12 Schools and Staffing Survey*. Also, Glenda L. Partee, Center for American Progress. June 2014. *Retaining Teachers of Color in Our Public Schools: A Critical Need for Action*.

^v Partee, *Retaining Teachers of Color in Our Public Schools*.

^{vi} Linda Darling-Hammond, Audrey Amrein-Beardsley, Edward Haertel and Jesse Rothstein. February 2012.

"Evaluating Teacher Evaluation." This article originally appeared in the *Phi Delta Kappan*.

^{vii} Ibid. See also, American Statistical Association Statement on Using Value-Added Models for Educational Assessment.

^{viii} See http://caepnet.files.wordpress.com/2013/09/final_board_approved1.pdf CAEP Accreditation Standards.

