

July 15, 2019

Kate Mullan

PRA Coordinator, Information Collection Clearance Program, Information Management Branch,  
Office of the Chief Information Officer  
U.S. Department of Education  
550 12th Street SW, PCP, Room 9086,  
Washington, DC 20202-0023

**RE: Comments to the Department of Education Regarding Proposed Revisions to Higher Education Act Title II Report Cards on State Teacher Credentialing and Preparation [ED-2019-ICCD-0066]**

Dear Ms. Mullan,

I am writing to comment on the proposed revisions to the State Report Card (SRC) for teacher preparation programs, as set forth in the Federal Register notice ED-2019-ICCD-0066, on behalf of New America's Education Policy Program.

New America is an independent, non-profit policy and research organization, and its Education Policy Program works to strengthen and improve the educational system so that all individuals—from birth to workforce—have equitable access to high-quality learning that prepares them for college, careers, and civic life in a time of rapid technological and social change. We bring intentional and sustained attention to the students, families and communities that are least well-served by existing educational policies and practices.

We appreciate the Department of Education's efforts to make changes to the State Report Card (SRC) that make the form more user-friendly while retaining or adding important information which can help inform states, preparation programs, hiring districts, and prospective teacher candidates as they make decisions about the provision and/or attainment of high-quality teacher preparation. Specifically, we appreciate that the Department is working to minimize the reporting burden on states by pre-populating the state form with the information from the individual Institution and Program Report Card (IPRC) forms submitted from programs within the state. The decision to report information for each provider broken out by the specific programs within it for purposes of indicating which programs are low-performing is also an improvement upon the current form. However, we believe that more changes are needed to ensure that the data reported can be effectively used by stakeholders to improve the quality of teacher preparation across the nation.

Specific recommendations for improving each section of the form are included on the following pages.

## Section I: Program Information

### *List of Programs*

We appreciate that state totals will continue to be aggregated by provider type (IHE vs. non-IHE, alternative vs. traditional). However, we are unsure why the Department removed the breakdowns of undergraduate and postgraduate programs within these, as programs will continue to report these data on the IPRCs. The Department should continue to aggregate and collect information on undergraduate and postgraduate programs to inform the public about the distinctions between their different offerings. Additionally, we recommend that the Department ensure that all information collected in the various sections of the state report cards be able to be sorted by provider type as well as by pre- vs. post-baccalaureate level when made available to the public.

Previously, the three types of providers documented via the SRC and IPRC forms have been “IHE traditional,” “IHE alternative” and “non-IHE alternative.” We appreciate that the Department has provided a high-level definition for alternative routes in the Glossary of Key Terms, while clarifying that each state will define what qualifies as an alternative route in their jurisdiction. However, over time, the term “alternative” has expanded to encompass a larger number of distinct sub-types of program models. Thus, it would be helpful to have states categorize their alternative routes using a pre-determined list of specific sub-types in order to promote meaningful insights about how qualifications and performance differ by various sub-types. As such, we recommend that the Department provide definitions and collect data on various sub-types of “alternative” programs that explain each program’s individual approach to teacher preparation, such as residencies and fast-track models.

### *Program Requirements*

Per our comment above, we are unsure why the Department removed the breakdowns of undergraduate and postgraduate programs within this set of reporting requirements, as the admission requirements will most likely differ within a given provider. We recommend adding them back in for this reason.

### *Enrollment and Program Completers*

Unlike other sections, this section does not appear to ask teacher preparation providers which house multiple types of programs (i.e., alternative vs. traditional, undergraduate vs. graduate) to provide data broken out by program type. This information should be provided so that candidates trying to decide which program may best meet their need can have the most detailed and accurate possible information.

Additionally, the form asks states to provide only the number of individuals enrolled and the number of program completers in the most recent year. Because most programs are multi-year in nature, these data are insufficient to determine how many individuals *within a given starting cohort*



*did or did not complete the program within the expected program length.* This information will be particularly helpful in identifying whether particular subgroups of teachers, such as candidates of color, are completing, and whether they are completing “on time.”

As such, we recommend collecting six additional data points on both the IPRC and the SRC: 1) the number of individuals who were expected to complete in the most recent program year; 2) the number of individuals who were expected to and did complete in the most recent program year; 3) the cohort completion rate within 100% of program length (defined as the number of individuals who were expected to and did complete in the most recent program year divided by the total number of individuals who were expected to complete in the most recent program year); 4) the cohort completion rate within 150% of expected program length; 5) the expected time to complete program (in years); and 6) the average time to complete program (in years). These enrollment and completion data would be most useful if they were disaggregated not only by gender and race/ethnicity but also by family income bracket (aligned with IPEDS net price data).

We also concur with the National Council on Teacher Quality’s recommendation to report not only on certification exam pass rates for program completers, but also to report number of all first time test takers and the percent of those who passed the test on that first attempt.

#### *Teachers Prepared by Area of Credential*

We assume that states will also provide statewide totals by area of credential when reporting these data, as well as totals by type of provider (traditional vs. alternative) but recommend that the Department include this instruction to ensure that they provide this information in addition to the provider-level data currently requested on the form.

Because these data are so directly connected to states’ and local education agencies’ need to understand which programs are, and which are not, addressing teacher shortage areas we recommend adding a column to the end of the table labeled “Shortage Area (Y/N)” so that state staff can easily scan to see which preparation programs are preparing teachers to meet shortage areas as they fill out current Section VII (Shortages). Additionally, we recommend moving this sub-section to the end of Section I, and moving the current Section VII (Shortages) to immediately follow, so that the information flows in a logical way.

#### *Teachers Prepared by Subject Area, Teachers Prepared by Academic Major, and Program Assurances*

As indicated in previous comments, we recommend including instructions for statewide totals to be provided as well (unless the Department plans to aggregate the data before publication on its end).

## **Section II: Assessing Program Performance**

Under the checklist of criteria used to assess teacher preparation program performance, we recommend adding two increasingly commonly used strategies which would otherwise end up in



the “Other” category. The first is surveys of program completers (at least 27 states currently include a survey of recent program completers) and the second is surveys of program completers’ employers (at least 28 states currently include an employer survey).<sup>1</sup> This would help more easily record the total number of states using these methods.

We would also make a few small tweaks to language:

- The criterion that says “Raising the standards for entry into the teaching profession” should be replaced to say “Raising the standards for entry into the teaching *program*,” (italics our emphasis) since ultimately states, not preparation programs, are the ones that determine whether teachers can enter the profession.
- In the instructions under “2.,” we recommend adding at the end, “Provide an explanation for why these measures were chosen.”
- The example for “Pass rates on state assessments” should encourage states to indicate which assessment the pass rate benchmark applies to (e.g., “Below 80% *on x assessment(s)*”) (italics our emphasis).

## **Section II: Teaching Credentials**

### *Teachers Credentialed*

We recommend adding a row for the total number of persons receiving an additional teaching credential. Many teachers go through additional preparation in order to take on new responsibilities, including to teach in shortage areas.

### *Credential Requirements*

We offer the following modifications to specific elements within the numbered list provided:

#3: We urge the Department to add the terms “emergency credential,” “temporary credential,” and “provisional credential” to the Glossary of Key Terms at the end of the form. States currently use these terms differently, particularly “provisional” which sometimes is a “full” license type without teachers needing to take additional action they would with emergency or temporary credentials.

#16: Insert the terms “completion of” before “state-approved.”

#17-21, 28: Insert the instruction “Describe.” at the end of the question

#24: Some states allow but do not require teachers to achieve National Board Certification as part of attaining a credential. As such, we recommend editing the question to say “Is passing National Board of Professional Teaching Standards assessment allowed or required? If yes, specify which.”

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<sup>1</sup> National Council on Teacher Quality, “State Teacher Policy Database: Other Data for Teacher Preparation Accountability,” accessed July 15, 2019, <https://www.nctq.org/yearbook/customReport?reportId=1021>.



## **Section V: Assessment Information, Pass Rates, and Scaled Scores**

### *Assessment Information*

The note included indicates that this sub-section would be preloaded from the IPRC data in the state. While this language is also included in the current form, we were confused by why this assessment information would be reported by program rather than statewide, given that the lowest possible score, highest possible score, and minimum passing score should be set by the assessment provider and/or state, and hence should be consistent across all preparation providers.

### *Pass Rates and Scaled Scores*

We recommend including the statewide median rather than (or in addition to) average, as this is a better snapshot measure (not so dependent on outliers).

## **Section VI: Alternative Routes**

We offer the following modifications to specific elements within the numbered list provided:

#6: We recommend adding “for entry or exit” to the end of the first question, as some alternative routes are pre-baccalaureate and some are post-baccalaureate.

#11: It is unclear whether this is referring to professional employment “during completion of the route” or employment at the end of the route. We recommend adding clarifying language to the end of the question.

We recommend adding a new question after #11 (new #12) “Is prior professional employment required? If yes, please specify.”

## **Section VII: Teacher Shortages and Teacher Preparation**

Per our previous comment, this section should be moved to immediately follow Section I.

## **Section IX: Improvement Efforts**

We appreciate the goal of minimizing burden for states in populating the form, but do not believe that this section should be preloaded from the state’s prior year Report Card as states may inadvertently submit this section without changes from the prior year.

We also recommend including an “Other” row in the activity/initiative checklist, and updating the language preceding the text box to say “*For any box checked above, describe the steps...*” (italics our emphasis).



Thank you for considering these comments. If you have any questions or concerns regarding our comments, please do not hesitate to contact me by phone at 202-735-2826, or via email at [tooley@newamerica.org](mailto:tooley@newamerica.org).

Sincerely,

Melissa Tooley  
Director of Educator Quality  
Education Policy Program

