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U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

September 11, 2023

RE: Docket ID ED-2023-SCC-0055

Thank you for the opportunity to provide comments on the Higher Education Act (HEA) Title II Report Cards on State Teacher Credentialing and Preparation.

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 have equitable access to high-quality learning that successfully prepares them for college, careers, and civic life. We bring intentional and sustained attention to the students, families and communities that are least well served by existing educational policies and practices. One of our primary areas of focus is on enhancing the quality, quantity, and diversity of the teacher pipeline, from recruitment to retention, with a particular emphasis on teacher preparation and professional development.

To this end, we generally support efforts proposed by the U.S. Department of Education to improve the quality and value of the information provided in the State Report Card (SRC) and Institution and Program Report Card (IPRC) mandated by Congress under Title II of HEA. In particular, we are supportive of efforts by the Department to share information about efforts by states and teacher preparation programs (TPPs) to improve the quality of preparation that prospective teachers receive, and of efforts to ensure that the data reported on the number and proportion of TPP completers are useful, reliable, and valid.

The Federal Register Notice requests that the public share comments on “how might the Department enhance the quality, utility, and clarity of the information to be collected.” However, the information shared by the Department is insufficient to be able to provide this type of input, as only a vague description of the proposed changes are shared. For example, the Notice indicates that “a new question about student completion rate” will be added in Section I: Program Information, but no specifics about the question are provided in the Supplementary Documents. Similarly, the Notice shares that there will be “five new multiple choice questions in Section VII: Teacher Shortages and Teacher Preparation, which are replacing three open text items,” and “a new multiple choice and open text item in Section IX: Improvement Efforts,” but does not share further details about these proposed revisions. Because stakeholders are unable to provide useful comments without additional information, we recommend that OMB require the Department to share further details with the public prior to approving the request.

Thank you for the opportunity to comment on efforts to improve the nation’s understanding of teacher preparation efforts that impact the quantity, quality, and diversity of our nation’s teacher workforce.



Sincerely,

Melissa Tooley
Director, PreK-12 Educator Quality
New America, Education Policy program

