January 30, 2015

The Honorable Arne Duncan
U.S. Department of Education
 400 Maryland Avenue, SW
Washington, DC 20202

Dear Mr. Secretary:

Thank you for the opportunity to submit comments on the U.S. Department of Education's pending teacher education rulemaking efforts (Docket ID ED-2014-OPE-0057). We applaud the Department for creating regulations to increase teacher preparation program accountability. As teachers of demonstrated effectiveness who were prepared through a variety of programs and who now teach in high-need schools and/or high-need content areas, we know firsthand the important impact teacher preparation has on teaching and learning.

We commend the Department of Education for its focus on accountability and believe it is important that the Department's final rule governing teacher preparation programs create multiple outcome measures to evaluate program quality. This will provide programs and states with meaningful, disaggregated data on how their teachers are doing in the field. We know that using data to drive instruction is essential to effective teaching, and want to ensure that preparation programs have meaningful data to drive their instruction of future teachers. We also hope that the States' final evaluation of teacher preparation program quality will be based in part on student growth that factors in the wide variance of teaching placements. We value the role of student growth and strongly support its inclusion in these regulations, but caution against evaluation measures that could discourage schools from placing graduates in high-need schools. Furthermore, it is important that no state evaluate a program as effective or higher without evidence that teacher candidates have a positive impact on student growth. As a check against state report cards, which have historically given inflated ratings to nearly all teacher preparation programs, no state should be allowed to award a rating of "effective" or higher to programs that consistently produce graduates with weak student learning outcomes.

We believe the outcome data will be invaluable to potential teacher candidates so they can make informed decisions about which preparation program they should attend.  We encourage the Department to require states to report the disaggregated data at the indicator-level, so that teacher candidates will have the most accurate information possible about student learning, placement and, of course, retention. When Teach Plus recently surveyed teachers on preparation and asked them to rank the top three factors that would have been useful to them in deciding which preparation program to attend, 68% (696 of the 1020 respondents) said retention rates of teachers, 61% said the impact of teachers on student achievement, and 53% said the job placement rate of graduates[i]. Clearly, teacher candidates want to know that their preparation program will set them up for success in the classroom.

We applaud the inclusion of language that requires States to evaluate preparation programs using at least four program performance categories (i.e. low-performing, at-risk, effective, and highly effective) that meaningfully differentiate preparation programs.  Title II of the Higher Education Act charges the Secretary with ensuring the "integrity" of teacher preparation programs' quality assessments and we believe that requiring meaningful differentiation among state performance standards for teacher preparation programs is essential to meeting that charge. Furthermore, we are pleased that the first step for a State upon identifying a program as at-risk or low-performing is providing that program with technical support, including sharing data from specific indicators to be used to improve instruction and clinical practice.  We hope that States can help bridge the gap between preparation programs and LEAs by using that data to create supports for those teachers whose needs were not met by their program.

Lastly, we commend the Department for connecting the state program evaluation results with eligibility to participate in the TEACH grant program. By holding a high bar for the grant, the regulations will ensure that these federal dollars support programs that produce teachers who are prepared to have a meaningful impact on student learning.  We respectfully offer the following comments:

## Subpart A--Scope, Purpose and Definitions
## § 612.2: Definitions.

*Definition: Content and pedagogical knowledge*

Current language: "Content and pedagogical knowledge: An understanding of the central concepts and structures of the discipline in which a teacher candidate has been trained, and how to create effective learning experiences that make the discipline accessible and meaningful for all students, including a distinct set of instructional skills, to address the needs of English language learners and students with disabilities, in order to assure mastery of the content by the students, as described in applicable professional State, or institutional standards."

Comment: Include language that ensures teachers have the pedagogical knowledge necessary for success and the training to teach students from diverse backgrounds and with a range of needs, including high-poverty students, for example "…..accessible and meaningful for all students, including a distinct set of evidence-based instructional skills, *including differentiation, classroom management, and data analysis,* to address the needs of English language learners and students with disabilities, *students from diverse backgrounds, gifted students,* and *students living in poverty,* in order to assure mastery of the content by the students, as described in applicable professional State, or institutional standards.

Rationale: As teachers of low-income and minority students, we know that poverty can play a large role in student learning and cognitive development. With recent research showing that the majority of public school students now come from low-income homes[ii], we believe it is critical that pre-service teachers have a strong understanding of the impact of poverty on students and their learning. We

also recommend adding explicit skills to address the needs of students from a range of backgrounds because it is important that teachers are able to create a welcoming classroom culture and recognize and be prepared to address issues around stereotyping or other challenges students may face in a classroom or society where they are a minority. **Lastly, we** know from our own experiences and as teachers who are often asked to mentor new teachers that two of the most significant challenges for first-year teachers are the ability to manage their classrooms and to differentiate instruction. In a recent Teach Plus poll of 1,020 teachers in 34 states, 55% of teachers responded that more instruction on classroom management would have made their teacher preparation program stronger, and 53% responded that additional courses on differentiating instruction would have improved their teacher training[iii]. We believe that including specific language on classroom management, differentiation, and data analysis will ensure that these are better addressed in preparation programs.

### Definition: New Teacher

Current language: "A recent graduate or alternative route participant who, within the last three title II reporting years, as defined in the report cards pursuant to §§ 612.3 and 612.4, has received a level of certification that allows…"

Comment: Remove "recent" from the definition; for example, "A graduate or alternative route participant who…."

Rationale: While we recognize that most teaching candidates go straight from their preparation program to the classroom, some may not teach immediately after graduation. For example, a teacher who took a few years off to care for a child, or a teacher who couldn't immediately find a full-time, permanent positionshould still be considered a new teacher when he or she becomes a teacher of record.

### Definition: Quality clinical preparation

Current language: "Training that integrates content, pedagogy, and professional coursework around a core of pre-service clinical experiences. Such training must, at a minimum--
   (i) Be provided, at least in part, by qualified clinical instructors, including school and LEA-based personnel, who meet established qualification requirements and who use a training standard that is made publicly available;
   (ii) Include multiple clinical or field experiences, or both, that serve diverse, rural, or underrepresented student populations in elementary through secondary school, including English language learners and students with disabilities, and that are assessed using a performance-based protocol to demonstrate teacher candidate mastery of content and pedagogy; and
   (iii) Require that teacher candidates use research-based practices, including observation and analysis of instruction, collaboration with peers, and effective use of technology for instructional purposes

**Comment**: Insert "effective" in describing mentor teachers, eliminate "at least in part," regarding clinical instructors, and require that the clinical practice include experience with high-need and high-ability students, as well as with using data analysis and developing classroom management skills, for example "(i) Be provided, ~~at least in part~~, by qualified clinical instructors, including school and LEA-based personnel, who meet established qualification requirements and who use a training standard that is made publicly available;

   (ii) Include multiple clinical or field experiences, or both, with ***effective*** teachers, that serve diverse, rural, or underrepresented student populations in elementary through secondary school, including English language learners, students with disabilities, ***high-need students*** and ***high-ability students,*** , and that are assessed using a performance-based protocol to demonstrate teacher candidate mastery of content and pedagogy; and

   (iii) Require that teacher candidates use research-based practices, including observation and analysis of instruction, collaboration with peers, ***data analysis, differentiation, classroom management***, and effective use of technology for instructional purposes."

**Rationale**: All instructors should be qualified clinical instructors. At best, field experiences with ineffective teachers will do little to help grow and support new teachers and at worst, they can have a damaging effect that perpetuates bad practices and prevents new teachers from becoming excellent. In addition, we recommend ensuring that clinical experiences include working with high-need and high-ability students because we believe it will provide a more robust and realistic experience. Our classrooms often include students with a wide range of skill levels, so having experience working with students at a range of skill levels will help a new teacher better and more quickly meet the needs of all students in the classroom. Lastly, differentiation, data analysis and classroom management are areas current teachers identify as weaknesses of their prep programs so it is important to ensure that a quality clinical practice requires practice in these areas.

### *Definition: Rigorous teacher candidate entry and exit qualifications*

**Current language**: "using….rigorous exit criteria based on an assessment of candidate performance that relies on validated professional teaching standards and measures of the candidate's effectiveness that include, at a minimum, measures of curriculum planning, instruction of students, appropriate plans and modifications for all students, and assessment of student learning"

**Comment**:  Add "classroom management," "differentiated instructional planning," and "assessment of student growth over time" to the requirements for mastery," for example, "using…rigorous exit criteria based on an assessment of candidate performance that relies on validated professional teaching standards and measures of the candidate's effectiveness that include, at a minimum, measures of ***standards-based*** curriculum planning, instruction of students***, classroom management***, appropriate ***differentiated*** plans and modifications for all students, and assessment of student learning growth ***over a period of time and planned interventions in response to student learning.***"

**Rationale**: In most state education systems, the academic foundation is the state standards that articulate what students should know and be able to do. A key part of effective planning is aligning

instruction with a state's standards, and for students to be successful, teachers need to show that they can implement instruction that maintains fidelity to the standards. We believe teachers should be able to demonstrate that they know how to use a standard to create a rigorous and coherent curriculum. Additionally, while it is important that teachers can make instructional adjustments for student modifications based on special needs within language barriers and disabilities, it is also critical that new teachers are trained in the craft of differentiating for learners who do not only have a particular diagnosed special need but may simply be struggling with a particular concept. Additionally, the assessments should be based on growth over a period of time in order to have a strong understanding of student learning. Lastly, classroom management involves a set of planning and decision-making skills that are separate from content delivery, but are equally valuable in helping students learn. It is important to explicitly specify that a teaching candidate's effectiveness in classroom management is included in the exit criteria for a teaching candidate.

### *Definition: Student achievement in non-tested grades and subjects*

Current language: "Student learning and performance, such as student results of pre-tests and end of course tests; objective performance-based assessments; student learning objectives; student performance on English language proficiency assessments; and other measures of student achievement that are rigorous, comparable across schools, and consistent with State guidelines."

Comment: Include language to ensure that student achievement in non-tested grades and subjects are still evaluated with assessments that are aligned to standards, for example "…such as student results of pre-tests and end of course tests *aligned to state standards*…and other measures of student achievement that are rigorous and *aligned to state standards*, comparable across schools *in a district and state*, and consistent with State guidelines."

Rationale*:* We believe that assessments of student achievement must be aligned to state standards to ensure rigor as well as consistency, regardless of whether they are in tested grades or content or not. It is also important that when data is compared, it is done across both schools and districts.

### Subpart B--Reporting Requirements
### §612.3 What are the regulatory reporting requirements for the Institutional Report Card?

Current language: §612.3 (ii)(c) "Must prominently and promptly post the institutional report card information on the institution's website and, if applicable, on the teacher preparation program portion of the institution's Web site: and…"

Comment: Add language to ensure that, if possible, the report card information is on the program's homepage, for example, "Must prominently and promptly post the institutional report card information on the institution's website and, if applicable*, prominently* on teacher preparation program portion of the institution's Web site; and…"

Rationale: We believe that a key function of these regulations is to provide prospective teacher preparation students with the information they need to make educated decisions about what preparation program to attend based on how well the program will prepare them for the demands of the profession. Ensuring that the report card with this information is easy to find is essential to achieving this goal.

Current Language: May also provide the institutional report card information to the general public in promotional or other materials it makes available to prospective students or other individuals.

Comment: Change this to must to require the dissemination of the report card to consumers, for example "***Must*** also provide the institutional report card information to the general public in promotional or other materials it makes available to prospective students or other individuals."

Rationale: It is critical that the report card is a tool for prospective students to make the best decision for their preparation. Students, their parents, and the community often learn about programs through promotional materials, so it's important that at least the program's state rating is listed on these resources.

## §612.4 What are the regulatory reporting requirements for the State Report Card?

Current language: 612.4(B) "… or produces teacher candidates with content and pedagogical knowledge and quality clinical preparation who have met rigorous teacher candidate entry and exit qualifications pursuant …"

Comment: Include "teaching placement," for example, "or produces teacher candidates with content and pedagogical knowledge and quality clinical preparation relevant ***to their teaching placement,*** who have met rigorous teacher candidate entry and exit qualifications pursuant…"

Rationale:  One reason many novice teachers struggle to meet the needs of their students in their early years in the classroom is attributable to a lack of clinical experience that is similar to the teaching environment in which they begin their careers. In a poll Teach Plus conducted last Fall, many teachers commented that while they were well-prepared to teach in a suburban school, their clinical experience did not prepare them to teach in an urban context, where they began their careers.

## §612.6 What must States consider in identifying low-performing teacher preparation programs or at-risk teacher preparation programs, and what regulatory actions must a State take with respect to those programs identified as low-performing?

Current language: §612.6(b) "At a minimum a state must provide technical assistance to low performing teacher preparation programs in the state to help improve their performance…"

Comment:  Add in a timeframe for states to provide the technical assistance to the low-performing schools from the time they were identified as low performing, for example, "At a minimum a state must provide technical assistance to low performing teacher preparation programs in the state *and begin this process within three months of being identified as low performing* to help improve their performance…"

Rationale: Without providing a timeframe, states may provide the technical assistance after much time has lapsed. We suggest three months at most because while waiting for the assistance, and in the early stages of its implementation, the program will continue to produce teacher candidates of lower quality.

### Subpart C--Consequences of Withdrawal of State Approval or Financial Support
### §612.7 What are the consequences for a low-performing teacher preparation program that loses the State's approval or the State's financial support?

Current language: "(b)(2) Immediately notify each student who is enrolled in or accepted into the low-performing teacher preparation program and who receives title IV, HEA program funds that, commencing with the next payment period, the institution is no longer eligible to provide such funding to students enrolled in or accepted into the low-performing teacher preparation program; and…"

Comment: Add a new section point to notify schools and districts were a student is involved in clinical practice; for example, *"(b)(3) immediately notify each school and district where a student of the program is involved in clinical practice that the institution has been deemed a low-performing teacher preparation program…"*

Rationale: It is not just the students, but also schools, districts and cooperating teachers – and students of student teachers – who will be impacted by a programs' loss of title IV funding. It is important that programs also make these entities aware of their loss of funding and the options for student teachers enrolled in the preparation program.

### Part 686 Teach Grants

Current language:  TEACH Grant-eligible science, technology, engineering, or mathematics (STEM) program: An eligible program, as defined in 34 CFR 668.8, in one of the physical, life, or computer sciences; technology; engineering; or mathematics as identified by the Secretary, that, over the most recent three years for which data are available, has not been identified by the Secretary as having fewer than 60 percent of its TEACH Grant recipients completing at least one year of teaching that fulfills the service obligation pursuant to Sec.  686.40 within three years of completing the program. Each year, the Secretary will publish a list of STEM programs eligible to participate in the TEACH Grant program and will identify each eligible STEM program by its classification of instructional program (CIP) code.

Comment: Include requirements for STEM programs to be rated as effective or exceptional for students to receive TEACH grants.

Rationale: It is important that we hold *all* programs to high standards for the TEACH Grant. While we understand the importance of getting STEM teachers into high-need schools, it does students little good if those teachers are unprepared for the realities of the classroom, and thus, continue the revolving door of inexperienced teachers in the schools that need strong, experienced teachers the most.

Current language:  686.2 (ii) Provides a two-year program that is acceptable for full credit in a TEACH Grant-eligible program or a TEACH Grant-eligible STEM program offered by an institution described in paragraph (i) of this definition or a TEACH Grant-eligible STEM program offered by an institution described in paragraph (iii) of this definition, as demonstrated by the institution that provides the two year program.

Recommendation: Add "or equivalent," for example "Provides a two-year *or equivalent program* that is acceptable..."

Rationale: Some programs could be less than two years, but the curriculum covered is the equivalent of a two-year program. If the program is rated by the state as effective or exceptional, students should be eligible for the TEACH grant.

We strongly support the Department's efforts to better serve students by ensuring that every teacher is fully prepared to teach all of their students from day one.  Thank you for your consideration of our views.

Sincerely,
Teach Plus Teaching Policy Fellows

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[i] Teach Plus (2015). Teacher Preparation Flash Poll. Question 6 of 7.
[ii] Layton, L. (January 16, 2015). A majority of US public school children are in poverty. *The Washington Post*. Retrieved January 16, 2015
[iii] Teach Plus (2015) Teacher Preparation Flash Poll. Question 5 of 7