



United University Professions

Docket ID ED-2014-OPE-0057
Teacher Preparation Program NPRM

February 2, 2015

Secretary Arne Duncan
U.S. Department of Education
400 Maryland Ave, SW
Washington, D. C. 20202

Dear Secretary Duncan:

We are writing to express concerns about the U.S. Department of Education's proposed regulations for teacher preparation programs, as released in the Notice of Proposed Rule Making (NPRM) on Dec. 3, 2014. We write on behalf of United University Professions, the largest higher education union in the U.S. which represents 35,000 faculty and professional staff at 29 state-operated State University of New York (SUNY) campuses, Empire State College, and SUNY System Administration. Seventeen of SUNY's Institutions of Higher Education have a broad array of teacher preparation programs. UUP maintains a Teacher Education Task Force, with representatives from all of those campuses. We are actively working with faculty and staff, campus administrators, and the New York State Education Department (NYSED) to address challenges facing teacher education in our state. Our comments represent concerns voiced by teacher education professionals across the SUNY system.

UUP has consistently demonstrated a commitment to high-quality teacher preparation programs. Our members are directly involved in teaching and providing support services for students. Our work includes supervising student teachers, arranging student teacher placements and other experiential learning activities with P-12 colleagues, collecting and reporting program and student outcomes data, and preparing assessments for internal evaluation and external assessment. Our programs are approved by NYSED and nationally accredited by NCATE, TEAC, or CAEP. SUNY's teacher education graduates are highly respected and dedicated practitioners in teaching and teaching-related jobs in New York State and across the nation.

The proposed federal regulations would excessively burden college-based teacher preparation programs without adding benefits to the work that's already underway to enhance program content and expand data collection that is useful for program development and assessment. They would expand test-based accountability, which has proven to be an invalid way to assess teachers and programs. This will encourage programs to admit more privileged students at the expense of diversity and equity in opportunity for potential future teachers. The proposed regulations also constitute

inappropriate federal overreach that will impose unfunded mandates on programs and states.

Imposition of costly, unproductive requirements with no added benefits

In recent years, New York's public colleges and universities have made heightened efforts to maintain and enhance the quality of their teacher preparation programs, undergoing considerable expansion of data collection and assessment practices for internal evaluation, state-mandated reporting, and external accreditation. Teacher preparation programs have been expanding their data collection to meet new standards developed by the Council for the Accreditation of Educator Preparation (CAEP) as well as Specialized Professional Associations (SPA).

In addition, New York State is in the process of developing a new system of institutional profiles for teacher preparation programs. This process has imposed staffing and resource demands on our colleges and universities without adequate funding.

Chronic understaffing and inadequate funding for the data collection and reporting operations already underway present considerable challenges for colleges and universities. Many of the proposed federal data requirements will not yield accurate, useful information for program development or program comparison purposes. They will, however, drain needed time and resources that would be better spent on work proven to enhance the quality of teacher preparation programs. Data collection begins at the education program level. In the context of faculty and staff reductions in recent years due to inadequate public higher education funding, excessive data collection at SUNY campuses takes needed time away from teaching, student teacher supervision, and other student needs. The new proposed federal regulations will impose new unfunded mandates at a time when traditional teacher preparation programs are already heavily engaged in the process of developing new standards, collecting and evaluating new data, and applying new accountability measures. This risks derailment of the beneficial work that is already underway in programs that are strapped for resources. At public colleges and universities in particular—which DOE reports as constituting 37 percent of the Institutions of Higher Education (IHEs) with teacher preparation programs—chronic underfunding is making it very difficult to maintain the staffing and resources needed to meet continually improving standards and accreditation requirements. The proposed regulations will unduly burden college-based programs without adding benefits to the work that's already underway.

In sum, IHEs are being held accountable to a complex set of internal and external assessment institutions. While it is important to continue improving data collection and assessment to inform ongoing program development, imposing new, unfunded mandates out of the context of already developing new standards and methods is neither educationally sound nor cost effective. There is no evidence that the newly proposed data collection requirements will yield more useful information than that which is already mandated. Moreover, such data are not appropriate for and not intended for high-stakes decision making.

New York State data system not prepared to handle burden of proposed regulations

The proposed regulations assume that state data systems are prepared to handle the demands of the new regulations. This is not true in New York State. The NYSED is

operating at minimal staffing and is already overburdened and unable to meet the data and certification system needs of the state's teacher preparation students and its colleges and universities. NYSED recently disbanded its state-sponsored Regents Accreditation of Teacher Education (RATE) due to budgetary constraints; it currently requires national accreditation for all educator preparation programs.

Finally, New York State is in the process of developing a new system of institutional profiles for teacher preparation programs, requiring a host of new data collection demands. This process has imposed staffing and resource needs on our colleges and universities without adequate funding.

The American Institutions of Research has estimated that the proposed new federal regulations would require the work of as many as three full-time state employees for the first two years of implementation. The experience in New York State makes it clear that a four-hour estimated work increase for implementing the proposed federal regulations glaringly underestimates the actual costs. Furthermore, a new federal mandate layered on top of a process that is already underway will not be beneficial. In addition to negative impacts at the institutional level, we believe NYSED would be hard-pressed to meet the new federal requirements under existing staffing and funding constraints.

Problematic use of test scores as indicators of quality teacher preparation programs

There are deep flaws in the assumptions underlying the proposed state ratings system for teacher preparation programs. First, the proposed regulations extend the misguided overreliance on student test scores as valid indicators of teacher preparedness, teacher preparation program quality, and faculty performance. Education research documents the importance of a broad range of contextual factors that play a role in developing high-quality teachers. There is no doubt that advantaged students tend to do better on standardized tests than disadvantaged students and that lower test scores are associated with factors that include inadequate school funding, poverty, the needs of English language learners (ELLs), the stability of school environments, and teacher turnover. By connecting P-12 students' test scores to the teacher preparation programs their teachers are trained in, the proposed regulations will provide an incentive for teacher preparation programs to direct their students to jobs in more privileged school districts and away from teaching high-needs students who are less likely to perform well on standardized tests. They may also discourage programs from admitting students who desire a teaching career in high-needs districts and/or in service to high-needs students. This will have a damaging effect on the diversity of the teaching workforce. In addition, through unintended consequences, this requirement will only help to fuel the chronic overemphasis on testing already present in K-12 classrooms.

Problematic use of employment data as indicators of quality teacher preparation programs

Using student employment data in assessments of teacher preparation programs fails to recognize the importance of students' variable career paths and potential for employment in teaching-related fields. College and university-based teacher preparation programs prepare students for careers in teaching as well as many other important fields that benefit communities, states and the nation. For example, SUNY's teacher education graduates are gainfully employed as administrators in education institutions at all levels,

special education teachers in non-school settings, and program developers for museums, television and radio outlets and other institutions that provide children's programming. They often pursue higher education careers in student affairs and college administration. They may work for private companies that provide education testing services, produce educational materials, or publish research. Educators in the Arts may employ their skills as consultants or in performing and visual arts productions. The list goes on and on. To narrowly define teacher preparation program quality in terms of a limited conception of employment for graduates is misguided and unnecessarily damaging.

Furthermore, the regulations would allow states to exclude teachers who teach in other states, teach in private schools, join the military, or go on to graduate school. Here too, New York State's experience is illustrative of the deceptive result of the proposed regulations. In November 2014, NYSED publicly posted student employment data for graduates from teacher education programs. Their data only included employment in NYS public schools, omitting employment in private and out-of-state schools as well as the full range of employment teacher education graduates obtain. This has seriously distorted the employment picture of teacher education graduates, with potentially severe and unjust consequences for college and university-based programs in our state.

Finally, the proposed regulations advantage alternative certification programs that train teachers on the job. Such programs can count all of their participants as "employed" even while they are still in training. This will ensure a high score for such programs, while college and university-based programs will be disadvantaged by this requirement because they cannot count their students as "employed."

In conclusion, the Department of Education has presented the proposed regulations as key to collecting meaningful information about teacher preparation program quality. However, the department has failed to demonstrate whether and how the new regulations will enhance the quality of data collection, particularly in light of massive efforts already underway in New York State and elsewhere. Inadequate funding for these new requirements will lead to a derailment of efforts that are yielding many improvements across institutions and states. In addition, the regulations are based on the faulty assumption that student test scores and employment data can be equated with program quality. These assumptions discount the range of contextual factors that reveal true quality. We believe the proposed regulations not only constitute federal overreach, but also amount to federal intervention that could impede state and institutional progress already underway to enhance teacher preparation.

Sincerely,
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