

February 2, 2015



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

RE: Docket ID ED-2014-OPE-0057 - Notice of Proposed Rule-Making for Title II of the Higher Education Act of 1965, as amended (December 3, 2014)

Dear Secretary Duncan,

We represent a group of education organizations in California, which inhabit varied roles in education policy advocacy but which all recognize the critical role that effective teacher preparation has on the future of our state and country. As such, we write to support the Department of Education's proposed regulations under Title II of the Higher Education Act. More specifically, we support the overall intent and policy shift of the proposed regulations in providing more meaningful information about how programs are preparing teachers to support student learning and fostering state teacher preparation oversight systems which can enable program improvement and accountability. We appreciate your leadership on this issue.

Specifically, the strengths of the proposed regulations to which we urge the Department to hold strong include the move toward elevating expectations for teacher preparation programs and making program outcomes more transparent. By establishing a foundation of measures by which the performance of teacher preparation programs will be assessed and including multiple actual student learning outcomes, the regulations keep the focus on student learning and mitigate against the prospect of unwelcome distortions in classroom practice that might occur if programs were judged on the basis of a single measure.

Not only do the proposed rules appropriately keep the focus on student learning, it is a reasonable request for California under its current requirements. All novice teachers in California must already be assessed annually and those assessments must include measures of pupil progress, "...at each grade level in each area of study."¹ Because the regulations allow for the required "student learning outcomes" to use either measures of student growth, teacher evaluation measures, or both, this

¹ California Education Code §44662(a), (b) and §44664

should not result in significant additional costs for the state in developing assessments to measure pupil progress, as that should already be addressed by LEAs throughout the state. Accordingly, therefore, we also believe some estimates of the new costs for California to comply are grossly overstated.

Moreover, considering the federal role in subsidizing higher education programs and student loans, we believe that the regulations reflect a reasonable federal role in setting basic expectations and guiding the data gathering process, while leaving it to the states' authority to regulate the operations of teacher preparation programs within their jurisdictions. By requiring a state to report publicly educator preparation program outcomes, preparation programs themselves, prospective students, and prospective employers can identify areas in need of improvement, hold providers accountable, and make better informed enrollment and hiring choices. Data should also be easily understandable to the public, disaggregated at the indicator-level to allow the public to see student learning outcomes, placement, and retention data by program, and when possible, by student demographic and school type. Without publicly-available data collected through commonly established standards, teacher preparation programs –as they have already demonstrated –will not make the necessary adjustments to improve their programs and states will remain unable to modify policy and support to ensure that the programs are meeting the needs of all their teacher candidates, and ultimately the students they'll teach in the K-12 classrooms.

Research has shown that teachers have the greatest in-school influence on student achievement but we have been reticent, as a state and country, to focus energy and resources on assuring the quality of our teacher preparation programs. As a result, many new teachers are unprepared for the demands they face in the classroom, and many school districts find teacher preparation programs failing far short of meeting their needs. These failings are unfair to teachers and devastating to students, especially the low-income students and students of color who are most likely to be taught by newly trained teachers.

In California, Governor Brown recently acknowledged in his January 2015 proposed budget that, “state oversight of the educator preparation system is currently not robust enough to verify that programs are meeting preparation standards and producing fully prepared teachers.” The proposed federal regulations reinforce the governor's position and provide important guidance to ensure that any solutions maintain a focus on transparency and program outcomes rooted in a preparation program graduate's effect on students in her classroom. At the same time, the proposed regulations also shine a light on some shortcomings in the current information systems in California that desperately need to be addressed to enable the state to provide meaningful oversight on what happens to teacher candidates once they leave a preparation program.

We do want to note that certain assertions relative to statutory restrictions on data in California are inaccurate. Specifically, Education Code §10601.5 establishes the California Longitudinal Teacher Integrated Data Education Systems (CalTIDES) and §10601.5(e)(1)(A) explicitly lists as its number one purpose to enable evaluating teacher preparation programs. Concerns regarding data sharing in California are also inaccurate and ignore the common-sense solution of redacting personally identifiable data. We hope that these proposed regulations can push California to take

the necessary steps remaining to have a robust and comprehensive state education data system, which is used for effective state oversight and accountability.

Thank you again for your leadership on this critical issue. When we allow preparation programs to fail their graduates, we are failing the teacher candidates, tax-payers, and most importantly the K-12 students they are assigned to teach. As our schools work toward ensuring all students graduate high school college- and career-ready, we must ensure these programs are producing effective teachers and leaders. We look forward to working with the Department to make these regulations meaningful and to support their implementation in California, and we thank you for your attention to these comments.

Sincerely,

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