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December 29, 2014

Howard Shelanki, Director
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

RE: Information Collection Request (ICR) Control Number 1840-0744—Higher Education Act (HEA) Title II Report Cards on State Teacher Credentialing and Preparation

Dear Director Shelanki,

The California State University (CSU) submits this public comment on the Notice of Proposed Rule-making (NPRM) published on December 3, 2014. The NPRM proposes new regulations to implement the requirements for the teacher preparation program accountability system under Title II of the Higher Education Act of 1965 as amended.

Our comments pertain to the time burden (hours) and the cost burden (dollars) associated with the NPRM. We are providing estimates of time and cost burden based on comprehensive data collected from three sources: (a) a survey conducted of the 23 CSU campuses that prepare teachers and currently complete annual Title II reports; (b) data collection costs reported by the eight CSU campuses that have participated in the U.S. Department of Education's Teacher Quality Partnership (TQP) program since 2009/10 and have been required to submit data annually that are similar to those proposed in the NPRM, and (c) data collection costs from campuses representative of the 22 that have had National Science Foundation (NSF) Robert Noyce scholarship programs that require annual reporting on some of the outcome data that the NPRM would require.

By way of context, CSU is one of the largest producers of teachers in the nation. It now averages approximately 7,500 teacher preparation program completers annually, representing four percent of graduates nationally, based on the most recent federal Title II Report data. CSU has the longest track record of any teacher preparation program in the nation in accountability, having begun assessing program effectiveness through comprehensive annual surveys of graduates and their employers twelve years ago. Findings of CSU's rigorous analysis of the NPRM costs follow.

CSU Campuses

Bakersfield
Channel Islands
Chico
Dominguez Hills
East Bay

Fresno
Fullerton
Humboldt
Long Beach
Los Angeles
Maritime Academy

Monterey Bay
Northridge
Pomona
Sacramento
San Bernardino
San Diego

San Francisco
San José
San Luis Obispo
San Marcos
Sonoma
Stanislaus

1. Program Level Institutional Report Card (IRC) Reporting. CSU collected, analyzed, and verified cost estimates for (a) adjusting record-keeping systems for the proposed NPRM revisions, (b) changing Title II reporting to the program level from the current institutional level reporting, and (c) posting the Title II IRC on institution of higher education (IHE) and teacher preparation program Web sites. CSU estimated costs and costs cited in the NPRM are provided below.

The CSU data were verified, and follow-up questions were asked of campuses to ensure accuracy. CSU figures are approximately ten times higher than those in the NPRM, and therefore comments are provided explaining the basis of the figures and reasons for these sizable differences.

a. Adjusting record keeping systems for IRC program level reporting

CSU estimated time burden: 42 hours per IHE

NPRM estimated time burden: 4 hours per IHE

Comment. Record keeping systems typically involve multiple component data systems. CSU campuses average 14 programs (close to the national IHE average of 14.65 per institution). Campuses estimate it would require 3 hours per program to adjust record keeping systems. The NPRM estimate is close to the cost of adjusting record keeping for one program, not an entire IHE.

b. IRC reporting at the program level: Data collection

CSU estimated time burden: 806 hours per IHE

NPRM estimated time burden: 78 hours per IHE

Comment. CSU campuses estimate 57.6 hours required per program annually or 806 hours for 14 programs for program level data collection. The NPRM estimates an annual burden of 78 hours per institutions. The figure is based on the assumption that IHEs would be reporting data that are already readily accessible, which is not the case for CSU.

c. IRC reporting at the program level: Data entry

CSU estimated time burden: 140 hours per IHE

NPRM estimated time burden: 13.65 hours per IHE

Comment. CSU campuses estimate 10 hours required per program annually or 140 hours for 14 programs for data entry. The NPRM estimates an hour to enter program data for each program and thus a total of 13.65 hours (14.65 hours minus an existing required hour, which reduces the new burden). Electronic reporting of data at the program level entails several steps, including sorting and organizing disaggregated data, contacting programs for which there are missing or questionable data, and verifying data through checks of internal consistency and reviews of data that represent outlier data points.

d. Posting of IRC on IHE Web site and teacher preparation portion of Web site

CSU estimate: 5.5 hours per IHE

NPRM estimate: .5 hours per IHE

Comment. CSU campuses estimate 5.5 hours required in order to post the IRC on the institutional and teacher preparation Web sites. The NPRM estimates 30 minutes (.5 hours). It is simply not possible to post the IRC prominently in so short a time. This estimated time would allow no more than creating a link to a report, and the expectation for prominent posting of report data is that the data itself from the report will be displayed on the two Web sites by preparation program.

Summary. The total costs of IRC program level reporting projected by CSU campuses are slightly over **ten times those projected in the NPRM**. In two cases—adjusting record keeping systems (NPRM figure of 4 hours) and reporting on Web sites (NPRM figure of 30 minutes), the NPRM estimates are exceedingly low, and complete and accurate CSU figures explain the differences. In the cases of data collection and data entry, the differences may reflect the fact that California does not have the data systems at the state level that are required for new elements that would be required by the proposed regulations and IHEs will need to collect these data. The total CSU dollar cost associated with the new IRC program level reporting would be \$605,001.

2. Additional IRC Outcome Data Requirements in Proposed Regulations. The major time and cost burdens associated with the proposed regulations derive from additional outcome reporting requirements. Importantly, they are not necessary for performance of federal education functions, are not consistent with current reporting practices, and do not use effective and efficient statistical survey methodology. The burden associated with reporting (a) student learning outcomes, (b) employment outcomes, and (c) graduate and employer survey outcomes are discussed below. The cost of locating graduates is included in the student learning outcome estimate and therefore is not included in the employment outcome estimate, substantially reducing that CSU figure.

a. Student learning outcomes

CSU estimated time burden: 484 hours per IHE

NPRM estimated time burden: 8.8 hours per IHE

Comment. CSU campuses and Teacher Quality Partnership (TQP) programs estimate that it will require 12 weeks to collect student learning outcome data for all of their graduates and to perform the analyses required to link outcomes to teacher preparation programs. This estimate represents 1.5 hours per graduate. In interpreting this figure, it is important to recognize that many CSU campuses have graduates in 20 or more school districts from which data would need to be collected. The NPRM estimate is based on state data systems providing student learning outcome data. CSU is skeptical of the modest NPRM figures given for linking of student learning outcomes to teacher preparation programs in view of the demonstrated high costs of required procedures.

b. Employment outcomes: teacher placement and teacher retention rates

CSU estimated time burden: 130.4 hours per IHE

NPRM estimated time burden: 11 hours per IHE

Comment: CSU estimates are based on data from campuses, TQP projects, and NSF Robert Noyce Scholarship programs. The figure represents 3.25 weeks per campus across the CSU system: one quarter of this time is for teacher placement data and determining if the graduate is teaching at the grade level, span, and subject area of preparation. Three-quarters of the time is for collecting retention data. Both include overall data and data for high-need schools. The NPRM estimates are based in large part on data from the states that currently link or that plan to link data on individual practicing teachers with their teacher preparation programs. California is not one of these states, and the burden is far higher.

c. Graduate and employer surveys

CSU estimated time burden: approximately 15 hours per IHE (2.2 added new hours per IHE)

NPRM estimated time burden: approximately 1.7 hours per IHE

Comment: CSU estimates include costs of (a) locating program completers, (b) establishing electronic or telephonic communication with them, (c) following up with initial non-respondents achieve large response rates, (d) completion of surveys by graduates and their employers (typically

principals), (e) analyses of survey data, and (f) reporting of data. The figures are based on deploying the CSU survey procedures that have been in place for twelve years. Thus, only new costs associated with ensuring a robust response rate are included in the estimated time burden. The added time is intended to increase response rates to 75%, and is 2.2 hours per IHE. NPRM estimates are based on a range of data, including the California State School Climate Survey (CSCS). CSU is puzzled about why this is used as a basis for calculations and comparisons since it has very little resemblance to teacher preparation graduate and employer surveys.

Summary. The total costs of the additional outcome data reporting requirements are high. Summing the figures for student learning outcomes, employment outcomes, and survey outcomes, the additional CSU system-wide costs are \$2,806,683 for student learning outcomes, \$756,000 for employment outcomes (\$189,000 for placement rates and \$567,000 for retention rates) and \$1,417,164 for new costs associated with graduate and employer outcome surveys. The total figure for the CSU system associated with the additional Title II outcome measures is \$4,855,449.

3. Total New Costs of Proposed Program Level Reporting and Outcome Data Requirements.

Combined CSU costs for new program level reporting and additional outcome data proposed in the NPRM are estimated to be \$5,584,848. The existing cost burden of Title II reporting for CSU is \$864,888 based on of 146 hours per IHE (comparable to national IHE costs). The cost burden to the CSU system associated with the proposed regulations, calculated over ten years, with existing costs subtracted, is \$4,719,960, which is \$20,521 per IHE annually and \$205,215 over ten years. Using this figure and multiplying by 1,522 IHEs, the total national burden is projected to be **\$312,337,230** over a ten-year period. These figures are based on institutional costs and are not estimates of full costs of the NPRM. There are additional state-level costs that are not included. These include, for example, start-up burden to states, stakeholder consultation, classification of teacher preparation programs, state record keeping, and examining, reporting on, and modifying state data collection and reporting activities as needed. The NPRM reports a total national cost of **\$42,100,000** over ten years. Based on detailed cost estimates that have been verified from multiple data sources, CSU projects that the actual figure is at least eight times as large. For IHEs, the actual costs are projected to be slightly more than ten times those reported in the NPRM.

Conclusions. The proposed regulations represent an economic hardship due to their large cost burden, more than three times the \$100,000,000 associated with a significant regulatory action. The proposed regulations would increase college/university costs materially—particularly those associated with teacher preparation. The cost burden would adversely affect teacher preparation institutions nationally. The proposed regulations, if adopted, would require significant new expenditures and, because funding for costs is not included, the required expenditures would need to be financed by the institutions, their students, grants, loans, or other state or federal funding.

Should you have questions about these comments, please do not hesitate to contact me at byoung@calstate.edu or at (562) 951-4747.

Sincerely,



Dr. Beverly Young
Assistant Vice Chancellor, Academic Affairs