

April 3, 2012

Dear Members of the Negotiated Rulemaking Committee on Teacher Preparation Issues,

As leaders of some of the nation's top schools of education, we are writing to express our appreciation for your service on the negotiated rulemaking committee and to reaffirm our commitment to accountability for teacher training programs. We have concerns about the proposed regulations under consideration, as outlined below:

**The proposed regulations would require states to develop high-stakes rating systems for teacher preparation programs using criteria that do not meet appropriate standards of validity.** For example, one of the criteria would involve "value-added" scores that measure achievement gains of K-12 students of program graduates. However, there is strong research evidence that challenges the validity of value-added scores for this type of high stakes decision-making. Moreover, even if standardized tests in the future improve to the extent that everyone would accept them as more accurate representations of student learning, value-added methods would still be inadequate for the purpose of measuring the quality of teacher training programs. Not only are there frequent measurement errors, but also the methods used often fail to control for factors that affect student performance, such as class size, student mobility, and non-school experiences during the school year. In the case of teacher education graduates, the context of their placements, such as working conditions, school leadership, and availability of educational resources strongly influence teacher success.

These issues make value-added methods unreliable, and their limitations will compel states and institutions to develop multi-method research studies to sort out the contributions of education schools from the many other factors affecting teacher performance. For obvious financial and political reasons, we believe it is unrealistic that states and school systems will be able to conduct the needed studies and implement methods that would overcome the otherwise misleading data that emerges from simplistic applications of value-added techniques.

Finally, many states and institutions are "exporters" to other states, which makes it nearly impossible for some preparation programs to follow the majority of their graduates once they complete their programs. There are also factors outside of graduates' preparation that have an impact on their decision to stay in or leave the profession. Tying retention to ratings can be problematic and can further undermine the meaning of the scores.

**The proposed regulations increase the regulatory burden on states and institutions and require them to report on data that most of them do not yet have the capacity to collect.** Requiring states to rate every program routinely will inevitably require them to gather new and extensive information from teacher preparation programs. For example, the Department's proposal references statewide surveys of all program graduates as well as surveys of the employers of program graduates. But most statewide data systems are not yet able to follow accurately

program graduates as they enter the workforce, thus making it challenging if not impossible to report on much of the data in the proposed regulations. Neither states nor institutions are equipped to take on these new requirements at such a large scale, particularly in the context of this challenging economy where funding cuts to higher education and state government are extensive.

Concerns about burden as well as the issues raised earlier about methodological challenges suggest that the regulations require states to initiate these activities on a pilot or experimental basis so that their feasibility and efficacy could be tested. We urge you to recommend a substantial testing and phase-in period, as would be the proper course of action for any large-scale test-based accountability program.

**The proposed regulations tie eligibility for student aid to the rating of the teacher preparation program.** Requiring states to rate every teacher preparation program on a 1-4 scale of performance and then tying that score to student financial aid eligibility could be troubling, for several reasons. Students with limited means may not have access to more than one or two preparation programs close to their home. If this access is limited or cut off we will be jeopardizing efforts to increase the teacher pipeline in hard-to-staff districts and jeopardizing college access, in general, to thousands of students. The regulations should assure that states provide options for students while efforts are being made to improve low-scoring institutions. In turn, it is imperative to assure that states have or develop the capacity to undertake improvement efforts.

Furthermore, most institutions include multiple preparation programs (e.g. elementary education, special education, math education). It appears that each program would be rated annually and TEACH Grants (and possibly other student financial aid) would be tied to that rating. This could result in a complex – and unworkable -- task for student aid administrators constantly reshuffling aid eligibility for multiple small programs.

We endorse the development of rigorous assessments of beginning teachers' readiness for responsible practice, including their ability to increase students' learning. One example is being developed by the Teacher Performance Assessment Consortium (TPAC). It is currently being field tested for validity and reliability in 26 states, at 180 institutions and with almost 9000 teacher candidates. We encourage the exploration of this and other approaches to assessment that can be shown to link teachers' skills and knowledge to students' academic growth. Federal statutes and regulations should support the development of these sorts of assessments, and should evaluate the validity of these tools.

Our bottom line is simple: *Teacher training programs should not be evaluated on the basis of measures that have not been shown to be meaningful, valid and reliable, particularly when high stakes decisions will be made based on these measures.*

We thank you again for your service, and hope you will consider our views during your deliberations.

Sincerely,

Deborah Loewenberg Ball  
William H. Payne Collegiate Professor in Education and Arthur F. Thurnau Professor  
Dean, School of Education, University of Michigan

Aimée Dorr  
Dean  
UCLA Graduate School of Education & Information Studies

Michael J. Feuer  
Dean and Professor  
Graduate School of Education and Human Development  
George Washington University

Susan Fuhrman  
President  
Teachers College, Columbia University

Donald E. Heller  
Dean, College of Education  
Michigan State University

Thomas James  
Provost and Dean  
Teachers College, Columbia University

Penelope L. Peterson  
Eleanor R. Baldwin Professor and Dean  
School of Education and Social Policy, Northwestern University

Lorrie A. Shepard  
Dean & Distinguished Professor  
University of Colorado at Boulder School of Education

Claude M. Steele  
I. James Quillen Dean and Professor  
Stanford University School of Education

Julie Underwood  
Dean  
University of Wisconsin – Madison, School of Education