

Comments on the U.S. Department of Education Proposed Teacher Preparation Regulations.

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Comments Presented On Behalf of the Professional Staff Congress/CUNY

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The Professional Staff Congress/CUNY (PSC) is the union which represents more than 27,000 faculty and professional staff at the City University of New York. Across CUNY, we have approximately 750 instructional staff members engaged in teacher preparation in seven schools of education and other teacher preparation programs.

As an academic union we are committed to: 1) advancing the professionalism of our members, 2) providing systems of accountability rooted in peer evaluation and evidence-based research, 3) ensuring a quality educational experience for our students, and 4) serving a culturally diverse and multi-racial student body. I offer these comments on the proposed regulations on behalf of the PSC.

On December 3, 2014 the U.S. Department of Education proposed new teacher preparation regulations which would require states to create rating systems with a minimum of four levels and stipulating that only programs ranking in the top two levels would be eligible for participation in the federal TEACH grant program. These rating systems would have four required components: student learning outcomes, employment outcomes, surveys, and professional accreditation or state program approval.

The PSC/CUNY strongly opposes these regulations because we believe their implementation would be bad for our students who are preparing to teach and for their students in P-12 schools. We arrive at this conclusion for the following reasons.

Component 1: Student Learning Outcomes

The basis of this component is standardized test growth using Value Added Modeling (VAM). With this proposed regulation, the USDOE is seeking to extend the current culture of testing. There is much research and experience with high-stakes tests in the P-12 setting that discredits its use for the purposes envisioned in the proposed regulations. The American Statistical Association issued a “Statement on Using Value-Added Models for Educational Assessment” on April 8, 2014. The following excerpt from the Executive Summary makes clear the limitations in the use of VAM derived from high-stakes tests:

“Many states and school districts have adopted Value-Added Models (VAMs) as part of educational accountability systems. The goal of these models, which are also referred to as Value-Added Assessment (VAA) Models, is to estimate effects of individual teachers or schools on student achievement while accounting for differences in student background. VAMs are increasingly promoted or mandated as a component in high-stakes decisions such as determining compensation, evaluating and ranking teachers, hiring or dismissing teachers, awarding tenure, and closing schools. The American Statistical Association (ASA) makes the following recommendations regarding the use of VAMs:

- ...Estimates from VAMs should always be accompanied by measures of precision and a discussion of the assumptions and possible limitations of the model. These limitations are particularly relevant if VAMs are used for high-stakes purposes.
- VAMs are generally based on standardized test scores, and do not directly measure potential teacher contributions toward other student outcomes.
- VAMs typically measure correlation, not causation: Effects – positive or negative – attributed to a teacher may actually be caused by other factors that are not captured in the model.
- Under some conditions, VAM scores and rankings can change substantially when a different model or test is used, and a thorough analysis should be undertaken to evaluate the sensitivity of estimates to different models.”

The ASA Statement goes on to point out, “Research on VAMs has been fairly consistent that aspects of educational effectiveness that are measurable and within teacher control represent a small part of the total variation in student test scores or growth; most estimates in the literature attribute between 1% and 14% of the total variability to teachers. This is not saying that *teachers* have little effect on students, but that *variation* among teachers accounts for a small part of the variation in scores. The majority of the variation in test scores is attributable to factors outside of the teacher’s control such as student and family background, poverty, curriculum, and unmeasured influences.”

Finally, the ASA Statement says that VAMs may have utility “...to evaluate effects of policies or teacher training programs by comparing the average VAM scores of teachers from different programs.” But, given the propensity for high concentrations of poverty, variations in the VAMs used over wide population areas, and the extensive range of other intervening variables (e.g. incomplete data on teachers moving across state lines), the use of VAM relying on high-stakes test for ranking teacher preparation programs is highly suspect.

Graduates of teacher preparation programs seeking to prepare teachers for high needs schools are likely to receive lower ratings on this component due to the high correlation between students’ test scores and their available resources at home, at school, and in the community. “Component 1” would discourage programs from educating teachers for the challenges of our neediest children. In addition, as programs serving high needs communities tend to attract more candidates of color, the effect of this component

would likely be to decrease diversity in the teaching force at a time when it is most needed.

Opposition to the use of standardized tests for high stakes purposes is growing. Some states are taking a pause in implementing more high-stakes. There is growing evidence that a culture of high-stakes testing has already harmed students, schools, communities, and reduced the quality of instruction as teaching-to-the-test takes hold. Far from improving educational outcomes, we believe “Component 1” will reduce educational quality.

Component 2: Employment Outcomes

Teacher Education Programs have little control over the employment of their graduates. Students may complete a program at a time of reduced teacher hiring in their local districts. Many factors contribute to graduates obtaining employment upon graduation, including the relative size of the employment area. While some teacher preparation programs in suburban and rural areas may have close relationships with school systems, graduates of programs in New York City are less likely to have the close relationships with school.

Teacher turnover is highest in high needs schools. Programs would have the potential for higher ratings if they prepare their students for high resourced schools where they are likely to stay. This would incentivize educating students for and creating partnerships with high resource schools. Teacher education programs preparing their students for high needs schools would be likely to get lower rankings, limiting their students’ ability to get the grants they need.

Finally, non-traditional “teacher residency” programs are allowed to count their students as employed before these students have graduated making these programs appear more successful than traditional programs. They can count all of their participants as employed, even while they are still learning to teach, virtually ensuring a very high placement rate for those programs. Under the proposed rules, traditional programs, which train teachers before they are licensed and hired, are only able to count students who get jobs after graduation. States can also rate alternative certification programs separately than traditional programs. At a minimum, the rules should be changed to allow for a fair and transparent comparison among programs.

Component 3: Surveys

New York State Education Department recently published data on pass rates for teacher certification tests (ALST, EAS, and edTPA). It appears that pass rates were reported for attempts at taking the test and not for individuals who passed the tests. That is, if a student took one of these tests three times and passed on the third attempt, the pass rate for the individual was reported as a 33% pass rate. Commissioner King, who has since left NYSED and is now an advisor to the Secretary of USDOE, released this flawed

data along with a statement about the importance of closing or merging schools of education. The misuse of data for political purposes undermines quality education. Surveys are particularly susceptible to political manipulation. Surveys, when done properly, can be useful tools for evaluation of programs and methods. But, given the history of the misuse of data in New York State, the use of surveys in a ratings scheme is highly problematic.

Component 4: Professional Accreditation or State Program Approval

Most, if not all, states already have systems in place for program approval. New York State in particular requires all programs registered for teacher education to meet rigorous criteria. In addition, there are national accreditation organizations currently evaluating teacher education programs and making their results publicly available. States must maintain control over certification and professional education organizations must maintain oversight of program content.

To summarize, the proposed regulations:

- *are an extension of previous test-based accountability systems:* These regulations build on the K-12 accountability systems established by No Child Left Behind (NCLB), Race to the Top, and the waiver process for the Elementary and Secondary Education Act (ESEA), bringing all of the concerns with these programs into the rating of teacher preparation programs.
- *may harm programs which serve high needs schools:* Teacher prep programs whose graduates teach in high-needs schools will likely receive lower ratings both on student growth measures and on employment measures, providing disincentives for programs to train teachers to work in high needs schools.
- *may exacerbate our teacher diversity crisis:* Because preparation programs that serve high-needs schools will be disadvantaged, and because many such programs prepare significant numbers of teachers of color, these regulations may result in the training of fewer teachers of color, adding to the mismatch between the US teacher and student populations.
- *will produce poor data:* K-12 test scores are not designed to rate teachers preparation programs. Furthermore, the data on program graduates will be incomplete, since states can exclude teachers who move across state lines, teach in private schools or positions which do not require certification, or who join the military or go to graduate school. The employment measures will include factors that programs cannot control, such as program graduates' decisions not to enter teaching.
- *are unfair and will give advantages to alternative certification programs:* Programs which train teachers on-the-job get significant advantages in these ratings.

There is great potential in the proposed regulations to reduce the diversity of our student body and to do great harm to the communities most in need of good schools. Teacher Education at the City University of New York focuses on educating students for urban, often under-resourced, schools where test scores are lowest, teacher turnover is highest, and those who wish to enter the teaching profession to serve their communities are more likely to be of color. Our students, who are often themselves without sufficient resources, need the grants that would depend on our rankings. Therefore, the proposed regulations risk further whitening the teaching force and harming our students who live in under resourced communities.

As I indicated at the outset, the PSC stands for professionalism and accountability. Our teacher educators have already gone through numerous accountability procedures. Adding additional faulty systems of reporting do not improve instruction or accountability. In fact, it is our opinion that the proposed regulations will reduce quality and diversity.

For these reasons, the PSC strongly opposed the newly proposed regulations for Teacher Education Programs.