



DEANS FOR IMPACT

Docket ID: ED-2014-OPE-0057

Deans for Impact
1500 Newton St
Austin, TX 78704

January 26, 2015

Honorable Arne Duncan
Secretary of Education
U.S. Department of Education
Washington, D.C. 20201

Re: Comments on the Department of Education's proposed regulations under Title II of the Higher Education Act

Dear Secretary Duncan:

Deans for Impact – a new national organization composed of deans of colleges of education and other teacher-preparation leaders that lead 18 programs that collectively train more than 15,000 teachers annually – write to offer our support for the Department of Education's proposed regulations under Title II of the Higher Education Act.

The education leaders participating in *Deans for Impact* lead programs from coast to coast that span the broad spectrum of institutions preparing new teachers and school leaders. Our institutions comprise public research universities, state colleges, private institutions, and residency programs. While the programs led by our members are diverse, we share a commitment to higher standards and accountability for preparing educators with the requisite skills and knowledge to teach and lead in ways that measurably improve student learning. To that end, we have committed ourselves to a set of guiding principles that embody a fundamental shift in the design and expectations of educator-preparation programs:

- **Outcomes focused.** The members of *Deans for Impact* are committed to using common metrics and assessments that validly measure their graduates' effects in the classroom.
- **Data driven.** The members of *Deans for Impact* are committed to collecting, sharing and using data to drive evidence-based change within their programs and across the field of educator preparation.

- **Empirically validated.** The members of *Deans for Impact* are committed to using the tools of research to identify the features of educator-preparation programs that improve student learning.
- **Transparent and accountable.** The members of *Deans for Impact* are committed to elevating expectations for educator-preparation program accountability and making program outcomes transparent to all.

Because we believe that each of these principles is reflected in the proposed Title II regulations, we support both the regulations and the broader policy shift that animates them. The new regulations support our goal of helping faculty and leadership across the 1,400 or so colleges of education in this country shift their practices.

Turning now to the specifics of the proposed regulations, we offer six specific recommendations for your consideration:

First, we urge the Department to hold the line on the proposed language that ties program accountability to multiple measures of learning outcomes. *Deans for Impact* believes that teacher preparation programs *should* be held accountable for our graduates' impact on their students' learning. We are committed to using outcome data, including performance assessments, observations, absolute measures of achievement, and value-added measures of student achievement, to drive improvement within the programs. We will work to persuade other teacher-preparation programs to do the same. We fully understand that value-added measures taken alone are insufficient to provide a full picture of teacher impact, but we believe they are one critical element in a system of multiple measures that form the basis of outcomes-based accountability.

Second, these regulations embody a limited but appropriate federal role in the data gathering process, while rightly reserving to states the authority to regulate the operations of teacher-preparation programs within their jurisdictions. We believe that the U.S. Department of Education can and should set effective minimum guidelines for collecting data and should identify a core data set including at least the following elements:

- Teacher admissions profiles
- Teacher placement information (including the percentage serving in high-needs subjects and high-needs schools)
- Teacher performance and student learning outcomes, based on multiple measures
- Teacher retention

Without data collected through commonly established standards and made publicly available, teacher-preparation programs – including our own – will be unable to drive evidence-based continuous improvement. The data collected will also help

states facilitate aligning teacher supply with demand. Indeed, *Deans for Impact* is committed to building a common data system by sharing metrics and data across states.

Third, the Department should make a sustained commitment to research evaluation of outcomes models, including value-added models, to ensure this shift in accountability leads to productive change. This empirical verification is critical to driving and directing program improvement across the field using data that is valid and reliable. We are particularly hopeful that empirical validation of outcomes-based models will help the field to identify programs that rigorously prepare educators from underrepresented populations, and programs that are effectively serving historically underserved communities.

Fourth, we would like additional clarification from the Department regarding the nature and intent of the TEACH grant waiver provision for low-performing programs that predominantly train teachers for STEM subjects. While we share the goal of increasing the supply of highly effective STEM educators, we are concerned this provision may unintentionally undermine that effort.

Fifth, we recognize that while it is of vital importance to elevate expectations of educator preparation programs, equally important is ensuring that the demographics of our teaching workforce evolve in the same direction as the student population as a whole. We therefore urge the Department to use every available tool at its disposal to increase the supply of highly effective educators, including substantially higher percentages of teachers of color, to serve students in high-needs areas and hard-to-staff subjects and schools. The need for effective educators to teach English language learners and students with individual education plans is particularly acute, and *Deans for Impact* is committed to helping meet this need in the field.

Finally, and although the Department will certainly hear calls to the contrary, *Deans for Impact* urges you to implement these regulations on a timeline that is faster than presently envisioned. While some transition time is appropriate, delaying the consequences until 2020 runs the very real risk that these regulations will not be taken seriously by the field. We therefore urge the Department to consider completing the phasing in of these regulations with greater alacrity, preferably by no later than 2018.

Too many students in this country experience persistent inequity in learning opportunities and outcomes. While this tragic reality is the result of multiple factors, we know that preparing well-trained, highly effective teachers is one vital part of the solution. By collecting and using valid evidence of teacher effectiveness to continuously improve preparation programs, we can end the era of guesswork in teacher preparation, and help to elevate the entire education profession.

The members of *Deans for Impact* are determined to transform the ways in which we prepare educators in this country. We look forward to working with the Department to refine, adopt and implement these regulations, and we thank you for your attention to these comments.

With respect,
The founding team of Deans for Impact