

State University Education Deans

February 2, 2015

Docket ID ED-2014-OPE-0057

Member Institutions

Bowling Green
State University
419-372-7403

Central State University
937-376-6007

Cleveland State University
216-687-3737

Kent State University
330-672-2202

Miami University
513-529-6317

Ohio University
740-593-9449

The Ohio State University
614-292-1414

Shawnee State University
740-351-3451

The University of Akron
330-972-7680

The University of Cincinnati
513-556-2321

The University of Toledo
419-530-6126

Wright State University
937-775-2822

Youngstown State University
330-941-3215

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

Dear Secretary Duncan:

The State University Education Deans (SUED) from Ohio is a voluntary association of deans that seek to improve the educational opportunities for all of the people of Ohio. We hold it as our responsibility to be advocates in the public dialogue on state and national education policy. As such, we have concerns about the U.S. Department of Education's proposed regulations for teacher preparation programs. While SUED actively supports accountability mechanisms for teacher education program that are fair, transparent, valid, reliable, feasible, and useful for program improvement, the regulatory proposal put forward by the Department falls far short of meeting these criteria.

Ohio has been a national leader in developing performance metrics for its fifty-three educator preparation programs. For the last three years, the Ohio Board of Regents has made these metrics publically available in its Ohio Educator Performance Reports. Data in this report include: overall licensure pass rates, value-added data for Ohio's University-prepared teachers and principals, teacher candidate academic measures, field and clinical experience data, pre-service teacher candidate survey data, resident educators' survey and persistence data, accreditation information, edTPA performance data and excellence and innovation initiatives.

These data have been used to spur innovation and research in educator preparation in Ohio. For example, we are expanding co-teaching models during student teaching to increase student learning. We are extending student teaching to a year-long experience. We are piloting the use of edTPA as a performance assessment that prepares teachers to be ready day one on the job. We are also studying these innovations to determine their efficacy.

What we have NOT done is use THESE data to rank our educator preparation programs because we do not have sufficient evidence that these data are reliably linked to improved P-12 student learning. Using value-added data is particularly problematic. There is a significant amount of research that suggests the use of value-added measures of P-12 students in the classrooms of our graduates is not closely tied to their college education. Further, small-scale studies have shown that a school's rating on the Ohio Report Card is a significant predictor of a graduate's value-added scores. To achieve high ratings, we would have to encourage our graduates to take jobs in highly rated schools where P-12 students are doing well academically. Our mission is to provide quality teachers for ALL P-12 learners. Rather than developing a state-wide ranking system, Ohio should continue studying the relationship between value-added data and the educator preparation programs.

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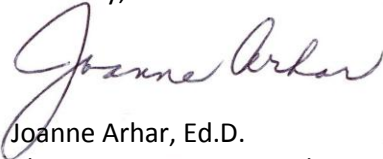
Another difficulty is gaining employer feedback on our graduates. Employers have not responded in the numbers we had expected, thus limiting the inferences we can make about the quality of our graduates' work in classroom. While Ohio is exploring new ways to gather employer feedback, we are willing to undertake a trial and error process to make sure we get it right. In a high stakes environment of a ranking system, our efforts to pilot approaches to data collection might be hampered.

To use a ranking system of institutions to determine financial aid is not responsible. It punishes students for choosing a college that may be the one they can most afford and that is available because of proximity. In the end it may have a negative impact on a college's ability to recruit high quality, under-represented teachers into the profession. We simply don't know what the impact of a ranking system would be.

Yes, we need ways to ensure the quality of each and every educator preparation program. Given the depth and complexity of the proposal's shortcomings, we urge you to withdraw it. Work with Congress to strengthen Title II and develop meaningful and valid accountability measures that will incentivize the ongoing reform work of teacher preparation programs. Allow the Council for the Accreditation of Education Preparation (CAEP) the time it needs to work with the profession to strengthen the accreditation process of educator preparation programs.

Please contact me, if you would like to discuss this further.

Sincerely,



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