TO: Jim Cibulka
President, National Council for Accreditation of Teacher Education

FROM: Sharon Robinson
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RE: Comments on CAEP Draft Standards

DATE: March 29, 2013

On behalf of the members of the American Association of Colleges for Teacher Education (AACTE), I want to commend the Council for the Accreditation of Educator Preparation (CAEP) Commission on Standards and Performance Reporting for issuing a praiseworthy draft set of high standards and expectations for the profession. Our members are keenly interested in ensuring that the overarching standards reflect what research and best practices identify as the most essential components of effective preparation. Further, they want to ensure that the standards respond to the public's desire to better understand the impact of educator preparation. To this end, the standards must balance the push for greater accountability, particularly in relation to demonstrating impact, with the reality of current systemic challenges that limit what our members can actually deliver.

AACTE has a vested interest in the establishment of high-quality standards for educator preparation, and we are strongly supportive of reaching professional consensus on those standards. We contribute the comments that follow in the hope that they will drive further deliberation and refinement of the standards that will define our profession. We have organized our comments to reflect the general strengths and concerns we observe in the draft standards, and we welcome the opportunity to meet in person with you to discuss these further.

Before I describe our specific comments, I want to make two broader observations. First, the five general standards themselves are the right ones. They represent the heart of the work that preparation programs must take on—ensuring that candidates know their content and know how to teach it; that programs are grounded in the needs of their local education communities; that programs are intentional about whom they recruit and the various points of selection in the program; that programs can show that they make a difference; and that programs have the capacity (in terms of finances, human capital, and infrastructure) to operate effectively. Second, a sentence toward the end of the draft standards document gives me pause: "The anticipated revisions over time will enable CAEP to rely more on program outcomes and performance results, and less on inputs and processes to make its judgments." I would urge CAEP to be mindful that accreditation is not about focusing on outcomes over inputs. It is about how, over time, the inputs and processes that CAEP measures are more directly tied to positive program outcomes. Our goal, through accreditation, is to support preparation programs in building evermore effective programs. Knowing outcomes alone will not help us fulfill this purpose.

Standard 1: Content and Pedagogical Knowledge

Strengths:

- These are high standards that reflect the research base about best practice (addressing social, emotional, and cognitive intelligences of PK-12 students).
- Candidates are expected to use research and evidence to evaluate and improve practice.
- Assessments are expected to be used to drive instruction and support student growth.
- Programs must show how candidates use new technologies to engage students in reasoning and collaborative problem solving.
- "Equity" is emphasized rather than "diversity."

Concerns/questions:

- There is not enough emphasis on preparing candidates with global competencies.
- We would like to see attention to preparing candidates to recognize the warning signs that students may be headed toward acts of violence or struggling with depression or mental illness.
- Some concepts require further elaboration and examples of how they will be measured (rubrics). These include the reference to developing "deep understanding" of content and principles of candidates' disciplines and "particularly the effects of their choices and actions on others" in 1.5.

Standard 2: Clinical Partnerships and Practice

Strengths:

- These standards emphasize co-constructed partnerships between programs and PK-12 schools to develop candidates, particularly in relation to jointly selecting, preparing, evaluating, supporting, and retaining clinical educators.
- It is wise to address technology-based applications in clinical practice.

Concerns/questions:

- As essential as partnerships are to preparation programs, the responsibility for a successful partnership cannot be laid solely at the feet of the preparation program. State education agencies, local education agencies, and unions must share in this work. Thus, this standard should allow for exceptions in cases where the preparation program, after exhausting all reasonable attempts, cannot develop a successful partnership with the PK-12 community it serves. How will CAEP address this possibility in its rubrics?
- Partnerships for clinical preparation can take a range of forms, participants, and functions. This variety should be highlighted so that institutions that are unable to *formalize* partnerships are not penalized.
- We recommend more emphasis on developing partnerships with arts and sciences faculty as part of the community.
- Why is there a focus on diversifying clinical faculty but not the rest of the faculty (tenure track)?

Standard 3: Candidate Quality, Recruitment, and Selectivity

Strengths:

- Attending to issues of workforce alignment (recruitment to meet employment needs) is critical.
- Including a separate standard on nonacademic factors in the selection process ensures these factors receive due attention.
- Programs are expected to monitor candidates' progression utilizing multiple formative assessments.
- We appreciate CAEP urging the profession to set national cut scores on the various certification exams. This goal moves the profession toward having a common expectation for performance on these exams and promotes public confidence in the quality of new teachers.

Concerns/questions:

- Entry into the profession is more important than entry into a preparation program; no empirical evidence shows that tests such as the SAT and ACT are predictive of how well a teacher candidate will perform in a preparation program and/or impact student learning in a PK-12 classroom.
- We have serious concerns about how these selectivity standards, particularly regarding the proposed program admissions requirements, will impact recruitment of candidates of color and other underrepresented groups.
- Some of the indicators listed in relation to recruitment of diverse candidates present legal and ethical dilemmas in reporting data and should be removed (i.e., religion and sexual identification). We recommend deleting 3.2 and rewriting 3.1 to say "The provider presents plans, goals, **and results** for strategic and recruitment outreach to recruit high-quality candidates from a broad range of backgrounds and diverse populations to accomplish their mission."
- We recommend adding a focus on assessing dispositions as a part of the pedagogical content knowledge and skills.
- We suggest changing "Selectivity during preparation" to "Use of multiple assessments during preparation to monitor candidate learning."
- Standard 3.7 calls for documentation that a candidate has reached a high standard "and can teach effectively with positive impacts on PK-12 student learning." How will this impact be measured? Will PK-12 standardized tests be used as evidence? This imprecision could be problematic.
- In the rationale section, reference to the work of NCTQ as one of "many professional efforts to define standards for teaching" undermines building professional consensus. NCTQ is a think tank started by an organization that is publicly opposed to schools of education. Further, there are numerous concerns related to its tactics and documented issues on its disparate research practices and flawed methodology by dues-paying members of NCATE and TEAC. NCTQ should not be considered a valid or recognized voice among the professional education community and cited in something as important as the national standards for all education preparation programs. Conversely, we do believe CCSSO's InTASC standards do represent the professional education community.

Standard 4: Program Impact

Concerns/questions:

- How, if at all, will the various components of this standard be weighted relative to one another?
- Will CAEP work with state departments of education to share data?
- The caveat "where available" should be highlighted; research on value-added data is inconclusive and as such should not be the first measure listed as documentation of graduates' impact on PK-12 student learning.
- edTPA is exclusively a preservice assessment of readiness to teach and should not be associated with in-service teachers.
- Data about employer satisfaction may be challenging to access (promotion, retention); again, the onus for data gathering that requires data *sharing* between LEAs and institutions falls squarely on the institution as currently written in the draft standards. The vast majority of information that this standard requires, however, is collected not at the institution level but at the district and state levels.
- Many students earn degrees/licenses in a different state from where they ultimately teach. There are significant challenges in tracking students who leave the state or pursue international travel. It is unfair to penalize the program (4.4) if it cannot track candidates into the field and/or out of state. (This requirement could particularly hurt programs in more rural locations and in small institutions). AACTE's recent PEDS report includes data on this topic.

Standard 5: Provide Quality, Continuous Improvement, and Capacity
Concerns/questions:

- What is the relevance of student loan defaults to program effectiveness? These criteria may have a negative effect on recruitment of candidates emerging from poverty and/or underrepresented students. A former candidate's ability to pay back a loan has no correlation to his or her impact on PK-12 student learning.
- What about students who defer repayment to pursue additional schooling or who are teaching in high-need regions?
- Again, what about candidates who leave the state/country? It is challenging to track graduates who leave the state, and requiring institutions to do so unfairly affects small programs with limited resources.

Comments on Annual Reporting and CAEP Monitoring

Measures of Program Impact

- It is likely not possible to collect data on retention rates across 5- and 10-year periods (#3). Even if possible, the research does not indicate that these are valid or reliable indicators of impact.

Measures of Program Outcomes

- There should be some recognition that many factors influence placement rates; institutions should not be held solely responsible (#7).
- See our concerns above about requiring programs to report on student loan default rates (#8).

Comments on Levels of Accreditation

- We support an accreditation process that either grants accreditation, with strengths noted, or does not grant accreditation, with areas for growth noted. The gold standard is problematic. How will CAEP determine when an institution surpasses the threshold for accreditation? The gold standard will breed exclusivity and lend itself well to many efforts in the policy arena to tie student financial aid to only the highest performing preparation programs. These efforts directly undermine the purpose of financial aid to support students in attaining postsecondary degrees and preparing for their careers.