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The Honorable Tom Harkin, Chairman
U.S. Senate Committee on Health, Education, Labor, and Pensions
Dirksen Senate Office Building
Washington, D.C. 20510

Dear Senator Harkin,

Thank you for the opportunity to comment on your draft bill to reauthorize the Higher Education Opportunity Act (HEA). We appreciate your leadership on this important legislation and your commitment to improving systems that recruit, train, and enhance the effectiveness and growth of teachers and school leaders. ASCD is also committed to building the capacity of educators to ensure student success. As you may know, ASCD is a nonprofit, nonpartisan membership organization whose 135,000 members in more than 145 countries are professional educators from all levels and subject areas—superintendents, supervisors, principals, teachers, professors of education, and school board members. Our higher education policy interests are focused primarily on teacher and leader preparation programs and the accountability of such programs.

Because teacher and school leader effectiveness are crucial components in school quality and student success, so are the programs that prepare teacher and leader candidates to help them address the needs of today's classrooms. These programs are in need of improvement and the reauthorization of HEA is the appropriate mechanism to incentivize appropriate changes.

ASCD appreciates that the draft bill provides support for school leaders as well as teachers and applauds the focus on clinical training experience, which provides the best opportunity for educators to apply their knowledge and receive feedback on instructional techniques, student behavioral interventions, and leadership skills. We applaud the bill's emphasis on collaboration between school districts and educator preparation programs to ensure that districts' needs are a high priority for teacher and leader candidate training.

We also appreciate the revised focus on program outcomes, as opposed to the requirement that data be collected on educator preparation program candidates' undergraduate test scores and undergraduate rankings. However, we caution that any required accountability data for preparation programs needs to be carefully evaluated for both usefulness and validity. The requirement that educator preparation program accountability be judged in part on student growth measures is of concern, as there is currently no research-supported manner of validly linking student achievement to classroom teacher performance. In fact, current research refutes the notion that good student performance is solely based on educator effectiveness and that poor student

performance is attributable to poor instruction. Furthermore, there is no way to validly link student achievement back to teacher preparation programs.

In addition, program graduates are placed in highly variable settings: some districts have clear performance goals, mentorship programs, and professional development, while many have none of these educator supports. Such systemic supports directly affect student performance, and this variability should be factored into any accountability system. Apart from considering such variances, measuring the success of an educator preparation program based on candidates' collective performance may not provide an accurate assessment.

The current data-collection requirements are burdensome and have not provided any clear benefit to either program providers or potential employers. Although data collection under the draft bill will, appropriately, focus more on graduates' performance than entrance qualifications, the burden and expense of collecting the data remains. Furthermore, under the bill, the failure of program graduates to positively affect student achievement leads to punitive responses without leading to improvements in program deficiencies. We urge you to carefully consider not only the usefulness of the data but also the burden of collection.

As elementary and secondary schools are in the process of implementing instruction and assessments aligned to new, more rigorous content standards, it is both appropriate and necessary to align what teacher candidates are learning to the same standards. Once again, however, caution must be exercised when it comes to expectations for beginning teachers. We cannot expect them to be high performing on assessments designed for experienced teachers. A type of formative assessment for beginning educators would provide information about their performance while allowing time and support for improvement.

There are many states that are in the process of closely analyzing and improving their educator preparation systems, and we would be happy to connect you and your staff to ASCD members who are involved in these promising efforts in those states. Educator preparation is vitally important work, and we at ASCD appreciate the attention and careful consideration you are giving it. We look forward to continuing to work with you and your staff as the reauthorization moves forward in the coming weeks.

Cordially,

A handwritten signature in black ink that reads "David Griffith". The signature is written in a cursive, slightly slanted style.

David Griffith
Public Policy Director