

# Minnesota Association of Colleges for Teacher Education

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## Proposed Teacher Preparation Regulations

On December 3, 2014, the U.S. Department of Education released the proposal for new regulations for teacher preparation (<https://www.federalregister.gov/articles/2014/12/03/2014-28218/teacher-preparation-issues>). As explained in the Department's announcement, "The Secretary proposes new regulations to implement requirements for the teacher preparation program accountability system under title II of the Higher Education Act of 1965, as amended (HEA), that would result in the development and distribution of more meaningful data on teacher preparation program quality (title II reporting system). The Secretary also proposes to amend the regulations governing the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program under title IV of the HEA so as to condition TEACH Grant program funding on teacher preparation program quality and to update, clarify, and improve the current regulations and align them with title II reporting system data." The proposed regulations would establish definitions for 25 specific terms, establish state and institution reporting requirements on program quality, and establish requirements for what states *must* consider in identifying low-performing programs along with the actions states *must* take in response to identified programs. In addition, several specific policies and requirements are proposed regarding preparation programs becoming TEACH-grant eligible. Although there is no federal funding to support the new requirements, the economic impact is estimated to meet or exceed \$100 million nationwide.

The proposed regulations would require states receiving funds under HEA to create a rating system for all teacher preparation programs. The mandated rating system must include at least four levels: *low performing*, *at-risk*, *effective*, and *exceptional*. At least these four indicators would need to be used to create the rating and be reported annually by the state:

1. Student learning outcomes: Measures of student growth during a teacher's first three years of teaching
2. Employment outcomes: Placement and three-year retention rates including at high-need schools
3. Teacher and employer surveys: Designed to "capture the perception" of effective preparation
4. Accreditation or state program approval: Assurances of knowledge, quality clinical experience, and rigorous requirements.

Although the federal regulations appear to mirror those of Minnesota, the requirements have the potential to impede the progress of current teacher preparation reform in our state. Among concerns are:

- The requirement that states use federally chosen rating systems and indicators encroaches on state decision-making rights. Policy changes of this significance should be subject to the full deliberation offered by the legislative process. This proposal should be submitted to Congress for consideration during reauthorization.
- The cost of the unfunded mandate for the State, the BOT, institutions, and school districts has been underestimated and is burdensome (e.g. increasing reporting frequency from biannual to annual).
- The proposed rating system has not been piloted or evaluated for efficacy or effectiveness. It is not ready for use with high-stakes consequences. Validity and reliability have not been established.
- Research demonstrates that the value-added approach for measuring teacher effectiveness is weak. Extending its use from P-12 to extrapolate teacher preparation program quality adds to validity concerns.
- Low- and middle-income students as well as students of color are disproportionately affected by changes in financial aid, and they would likely be disproportionately affected by these changes tied to financial aid and grants.

MACTE invites continued, collaborative investigation of the regulations for portions that match or positively enhance teacher preparation and for those parts that would limit or harm Minnesota's efforts for effective teacher preparation. Commentary and feedback on the proposed regulations are due to the U.S. Department of Education by February 2, 2015.