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May 29, 2014

Ms. Susan K. Haberstroh, Ed.D.
Department of Education
35 Commerce Way – Suite 1
Dover, DE 19904

RE: DOE Proposed Approval of Educator Preparation Programs Regulation [17 DE Reg. 1030 (5/1/14)]

Dear Ms. Haberstroh:

The State Council for Persons with Disabilities (SCPD) has reviewed the Department of Education's (DOE's) proposal to adopt a new version of its standards covering educator preparation programs and initial licensure. The proposed regulation was published as 17 DE Reg. 1030 in the May 1, 2014 issue of the Register of Regulations.

As background, the primary impetus behind the revisions is to conform to S.B. 51 enacted in 2013 and to align to changes in the national teacher accrediting agency. A non-exhaustive list of changes is compiled in the Synopsis of Subject Matter of the Regulation. Parenthetically, a University of Delaware professor authored the attached April 27, 2014 News Journal article which questions some of the statutory and regulatory standards. The professor is dubious that a "raising the bar" approach for prospective teachers will result in improved teaching. Overall, the new standards are quite rigorous and impose far-reaching obligations on education preparation providers. SCPD has the following observations on the proposed regulation.

First, in §1.1, SCPD recommends modifying the reference to "14 Del.C. §§122(b)(22) and 1280(a)" since both statutes impose a licensing and DOE approval requirement.

Second, the regulation contains multiple references to the DPAS-II. See, e.g., §2.0, definition of "High Quality Cooperating Teacher"; and §6.1.4.3. In other regulations published this month, the DOE notes that it may approve a different appraisal system. See 17 DE Reg. 1018, §1.0 (May 1, 2014); and 17 DE Reg. 1014, §1.0. The DOE may wish to consider adding a definition of DPAS-II which encompasses any DOE-approved replacement of the assessment system.

Third, in §2.0, definition of "High Quality Clinical Supervisor", there's a plural pronoun (they) with a singular antecedent (supervisor). Consider substituting "...field in which supervision is provided...".

Fourth, in §2.0, the definition of "High Quality Clinical Supervisor" would allow a supervisor to qualify under this standard even if rated "Ineffective" on all five DPAS-II components if the supervisor achieved a satisfactory rating on some other evaluation system. The latter evaluation

system could be a brief, in-house assessment. The DOE may wish to reconsider whether this option should be less "open-ended".

Fifth, Title 14 Del.C. §1280(b)(2) authorizes entry of students into an educator preparation program based on "achieving a minimum score on a standardized test normed to the general college-bound population, such as Praxis, SAT, or ACT, as approved by the Department." In contrast, §3.1.1 merely refers to "achieving a score deemed to be College Ready on a test of general knowledge normed to the college-bound population." Although there is a definition of "College Ready", the Legislature expected the DOE to identify and approve qualifying tests, not simply say any test of general knowledge nationally normed for college-bound students is acceptable. There may be many tests of general knowledge with norms for incoming college students which are not comparable to the Praxis, SAT, or ACT. In deference to the statute, the DOE may wish to define qualifying tests as the Praxis, SAT, and ACT and other tests approved by the Administrator.

Sixth, in §3.2.1.1.2, there is a lack of consistent form. See Register of Regulations Style Manual, §6.2.3. Consider substituting "A recipient of" for "Receives".

Seventh, in §3.2.1.2, consider substituting "with a summative effective or highly effective rating under 14 DE Admin Code 108" for "deemed effective or highly effective under 14 DE Admin Code 108". Otherwise, administrators could posit that they qualify based on ratings on individual appraisal components.

Eighth, in §3.4.1.1.1, consider inserting "Professional" before "Standards Board".

Ninth, in §§7.3.1 and 7.3.2, SCPD recommends substituting "may" for "shall". If a Unit or Program fails to meet only a technical or minor standard, the DOE literally has no discretion but to revoke approval. This is a rather "brittle" approach which unnecessarily limits DOE discretion.

Thank you for your consideration and please contact SCPD if you have any questions or comments regarding our observations on the proposed regulation.

Sincerely,

Daniese McMullin-Powell

Daniese McMullin-Powell, Chairperson
State Council for Persons with Disabilities

cc: The Honorable Mark Murphy, Secretary of Education
Dr. Donna Mitchell, Professional Standards Board
Dr. Teri Quinn Gray, State Board of Education
Ms. Mary Ann Mieczkowski
Ms. Paula Fontello, Esq.
Ms. Terry Hickey, Esq.
Ms. Ilona Kirshon, Esq.
Mr. Brian Hartman, Esq.
Developmental Disabilities Council
Governor's Advisory Council for Exceptional Citizens

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RAISE THE BAR (CAREFULLY) IN TEACHER EDUCATION

Calls for higher admission standards not the answer in shaping better educators

FRANK B. MURRAY

Calls to "raise the bar" for admission to Delaware's teacher education programs, like those that will take effect this July from Delaware's Senate Bill 51, are based on a reasonable assumption that the bar and the quality it represents are related so that raising one would lead to increases in the other. When that relationship is weak (the typical case) or non-linear, it is likely, however, that raising the bar will have no effect on quality and may in fact lower it.

The field of education has not in fact established many causal links between standards and the educational outcomes allegedly influenced by them. We know very little about what must come before what in intellectual and academic development, for example. While there are studies showing links between some sensori-motor skills and beginning reading, reading can also be acquired without those skills in place. Typically educational prerequisites and selection criteria are promoted on their making a kind of sense, like knowing the names of letters before one can learn to read; but knowing letter names is not in fact related to beginning reading as one can read without knowing the names of the letters. Diagramming sentences would also seem to be sensibly useful for developing writing, but it has no independent link to composition and writing either, if only because any number of competent writers have never diagrammed a sentence. Knowing algebra might seem like a prerequisite for knowing geometry, or chemistry for physics, but each can be understood without the study of the other. Historically, educators argued that the study of Latin was a pre-requisite foundation for learning other languages or the study of Aristotelian logic was indispensible for critical thinking only to have it turn out that each has no particular benefit for language or critical thinking performance.

In teacher education, there is a per-

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fectly reasonable presumption that academic achievement, represented by high grades in subject matter, license and admission test scores should be associated with teaching skill. The Teacher Education Accreditation Council (TEAC) has found throughout the history of its accrediting over 200 programs nationally since 1997 that ratings of teacher candidates' performances in the classroom tends to have a zero or even a slightly negative correlation with several common academic measures – college grades, scores on state licensure tests, and scores on college admission tests.

The consequences of raising the GPA standard when the relationship between grades and teaching performance is curvilinear is that there are also increases in the percentages of admitted candidates who turn out to be weaker in their teaching performance than had the program not raised its GPA bar past the point of curvature. While raising the bar inevitably gives the program fewer candidates, it also gives it proportionately more candidates who prove to be weaker teachers and the program loses proportionately more who would have been as good as those who graduate. Thus, the popular call to raise the bar for the standards for those entitled to enter teacher education programs must be considered carefully and only after a systematic investigation into the precise relationship between the standard and the quality it is thought to represent.

Typically one finds that none of the grades or standardized admission test measures has a meaningful or significant relationship with the clinical assessments of actual teaching. While grades and standardized test scores are positively and significantly related to each other, they often are not related to the assessment of the candidate's teaching performance.

There are a number of possible explanations for this consistently weak relationship between measures of academic accomplishment and ratings of teaching accomplishment. There could be two separate and distinct "factors" – the ability to get high grades and scores and the ability to relate effectively to young people and teach them successfully. If that were the case, it is no surprise that the academic and clinical measures are not related. The lack of relationship could be due to limited variation that stems from documented grade and rating inflation. This explanation is weakened by the fact that there are statistically significant correlations among the inflated clinical measures themselves and among the inflated academic measures themselves, but just not between them. Perhaps candidates with the relatively lower academic measures can't perform well in the classroom because they lack the subject matter knowledge and allied pedagogical knowledge to do the job well, and perhaps the extremely able scholars have difficulty coping with and motivating struggling learners. These downturns at either end of the range of performance might also account for the zero correlations. It might also be that teachers need only a modest level of academic attainments to succeed in the classroom. After that level or tipping point is reached, additional academic attainments make no appreciable difference.

It is also possible that the lack of relationship is simply due to poorly crafted assessments in which none of the program's academic measures assess any teaching performance and none of the clinical assessments deal with the academic content of the program. We do in fact occasionally findsignificant positive relationships in the few instances when the pedagogical and content courses also have clinical components and when the clinical courses have academic content in the subject matter and pedagogy.

The "raising-the-bar" for grades, license scores, admission scores are advocated by policy-makers, like those who sponsored and voted for Bill 51, because they think that doing so will eventually improve teaching. This "raising-the-bar" approach for the prospective teacher, however, has another serious weakness. It overestimates the influence internal personal characteristics (like ability, disposition, knowledge, motivation, personality, etc.,) have in accounting for and explaining teaching behavior and it underestimates the influence of external situational factors and actions. This bias leads education reformers to focus on the characteristics and traits of the teacher and not directly on the features of teaching acts themselves, the very things the reformers seek to influence. The shift in focus from the teacher to teaching entails the study of, and the subsequent improving of, the routines, artifacts, lessons and methods of teaching a particular subject.

To have standards for teaching, and not just for the teacher, requires a determination of whether the pupils learned anything more or better as a result of the changes the reformers put in place. One pre-requisite for these raising-the-bar reforms, would be to raise a different bar, not for the standards about teacher traits per se, but for the quality of the evidence we accept as evidence for the standard that teaching was effective. This is this bar that tells us that the evidence we have accepted (or rejected) allows us to accurately distinguish truly low quality from truly high quality teaching.

This is the bar or standard we have for the authenticity, accuracy, reliability and validity of the evidence used by teacher education programs to support their confident claim that their graduates can teach effectively. This bar for the standard of teaching sets the criterion by which we know that the teacher's students have learned what was expected of them in the lesson.

This is the signature criterion of a quality preparation program and for that reason should be the signature and only standard for the state's standards for teacher education programs.

Frank B. Murray is H. Rodney Sharp Professor, School of Education, University of Delaware.