



STATE OF DELAWARE  
**STATE COUNCIL FOR PERSONS WITH DISABILITIES**  
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August 29, 2011

Ms. Susan K. Haberstroh  
Education Associate  
Department of Education  
401 Federal Street, Suite 2  
Dover, DE 19901

RE: 15 DE Reg. 146 [DOE Proposed Educator Preparation Program Regulation]

Dear Ms. Haberstroh:

The State Council for Persons with Disabilities (SCPD) has reviewed the Department of Education's (DOE's) proposal to adopt a regulation authorizing the creation and implementation of an optional approach to alternate routes to teacher licensure and certification. The regulation authorizes, but does not require, the discretionary issuance of a DOE RFP to solicit applications from providers of teacher preparation programs. The proposed regulation was published as 15 DE Reg. 146 in the August 1, 2011 issue of the Register of Regulations.

In a nutshell, it appears that the regulation provides a method to target funds to address the need for teachers in critical-need subject areas. Parenthetically, the attached August 6, 2011 News Journal article provides some support for the notion that there may be a national problem with the lack of production of teachers in critical-need contexts.

The regulation contemplates imposition of some rigorous standards on participating educators, including "intensive pre-service training, teacher evaluations conducted by school administrators, completion of coursework, and measures of teacher effectiveness based upon student performance data." There may be competing values inherent in this approach. On the one hand, adoption of more rigorous standards should theoretically result in more qualified teachers. On the other hand, adding disincentives to participate in alternate routes to teacher certification may deter promising candidates from pursuing certification. Weighing the competing considerations, SCPD endorses the proposed regulation.

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

Sincerely,

A handwritten signature in black ink that reads "Daniese McMullin-Powell". The signature is written in a cursive style with a large initial 'D'.

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

cc: The Honorable Lillian Lowery  
Dr. Teri Quinn Gray  
Ms. Martha Toomey  
Ms. Paula Fontello, Esq.  
Ms. Terry Hickey, Esq.  
Mr. John Hindman, Esq.  
Mr. Charlie Michels  
Mr. Brian Hartman, Esq.  
Developmental Disabilities Council  
Governor's Advisory Council for Exceptional Citizens

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## *UD is preparing top-notch teachers for Delaware's future*

**A**s Delaware gears up for the start of another school year, the biggest point of concern for parents and children alike is who will be their teacher. Having a knowledgeable, capable teacher matters more to a child's education than any other single factor.

At the University of Delaware, we are committed to developing teachers with the experience and knowledge to succeed in the classroom. Our goal is to produce the kind of teachers we would be happy to have teaching our own children, teachers who strive to ensure their students are motivated, inspired and, most important, educated.

Our Elementary Teacher Education program has a number of initiatives that help us reach that aim, while setting it apart from many other education programs.

### **DELAWARE VOICE**

**NANCY BRICKHOUSE**

To gain practical experience, our students begin "student teaching" in their freshman year. By the time they graduate, they will have spent 200 hours in real-world classrooms – first observing, then tutoring and addressing classroom management behaviors, and finally constructing and carrying out their own lesson plans. Student teachers are observed at least five times by a university supervisor. Upon graduation, they will have not only theoretical knowledge of teaching but invaluable hands-on experience as well.

Graduates of our Elementary Education program are well regarded. Their outstanding performance on national tests, combined with their success in field placements and student teaching, make them highly sought after in Delaware and surrounding areas. Furthermore, we collect extensive data on the knowledge and competencies our students acquire as they progress through the program. This data, based on outcomes, supports our continuous improvement efforts as well as the overall effectiveness of our graduates.

The National Council for Teacher Quality (NCTQ) recently released a report on student teaching in the United States. In this review, student teaching in elementary teacher education programs was evaluated based on five standards. To assess whether an institution met these standards, NCTQ analyzed policy documents. The University

of Delaware was one of 134 institutions reviewed. NCTQ rated UD's program as "weak." This is the same rating received by Vanderbilt University (No. 1 ranking by U.S. News and World Report in 2011), New York University and the College of William and Mary.

The NCTQ report concludes that the profession as a whole is insufficiently attentive to the quality of student teaching placements. They suggest that one of the reasons for this is we are overproducing elementary teachers. This is an important point – and one of the reasons that several years ago UD's Elementary Teacher Education faculty agreed that we would not prepare teachers the profession did not need. All of our elementary teacher education majors are required to select an additional certification or concentration in a high needs area such as special education, a middle school content area, or in urban education. This ensures our graduates are better able to handle the diverse classroom environment found in many of today's schools.

The NCTQ study was not well conceived or carried out by individuals trained as social science researchers. Their standards are not well defined and the collection and analysis of data are not well described. The evidence NCTQ collected is limited primarily to policy documents. They describe a survey of principals but give no analytical data on its development, its distribution, or its results. They do not address what really matters about student teaching, such as what student teachers take away from the experience and how it shapes their participation in the profession.

Due to legislation signed in April by Gov. Markell, public schools in Delaware will be able to recruit and hire top teaching talent much earlier in the summer. This, in conjunction with the new emphasis on the importance of high-quality teachers in the Race-to-the-Top grant, means Delaware schools have new capabilities and incentives to hire UD graduates and to place them in the schools where they are needed most. As both a parent and an educator, I'm proud to know that the University of Delaware is playing such an integral role in the education of Delaware's children.

Nancy Brickhouse is interim dean and a professor in the College of Education and Human Development at the University of Delaware.

8-6-11 NJ