

Only three comments were received in response to public notice of the Higher Education Act (HEA) Title II Report Cards on State Teacher Credentialing and Preparation OMB Submission. These comments and responses are summarized below.

Comment: One commenter wanted to encourage federal regulation to ensure that the State reporting requirements are consistent across teacher preparation programs, including teacher preparation programs provided through distance education. Quality assurance should include metrics such as student learning outcomes, employment outcomes, survey outcomes, and program characteristics for all programs including those distance learning programs. The commenter also asked that clarification be given on which State or States would be responsible for reporting on, and determining the performance level of, teacher preparation programs offered through distance education. The commenter felt that the proposed regulations are also unclear regarding both how TEACH Grant eligibility would be determined for students enrolled in a teacher preparation program offered through distance education, and, specifically, in instances where different States provide conflicting ratings.

Response: No change. Under Title II of the Higher Education Act of 1965 (HEA) as amended in 2008 by the Higher Education Opportunity Act (HEOA), States are required to report annually on key elements of their teacher preparation programs and initial requirements for teacher credentialing. This current public notice extends that requirement and is not associated with any proposed regulations.

Comment: Another commenter cited challenges faced by institutions related to reporting. These challenges include the cost of report preparation; the lack of common terminology, common data requests, and common timelines so that data could be reported one time for multiple purposes; and the inability of individual institutions to collect data from graduates in the field due to high cost and burden. The commenter recommended developing a state-wide evaluation form for employers, implementing a state-wide data collection system, allocating resources to support data collection and dissemination to EPP (Education Preparation Providers), and providing an opportunity for institutions to identify their program. The commenter suggested that it should not be assumed that standards are too low based on success in passing the tests.

Response: No change. The Department believes that the benefits in requiring this reporting outweighs the costs of the reporting under Title II of the Higher Education Act of 1965 (HEA) as amended in 2008 by the Higher Education Opportunity Act (HEOA). Relative to these costs, the major benefit of these requirements, taken as a whole, would be better publicly available information. The Department does not have plans to develop a State-wide evaluation form for employers, as we believe States are able to create the forms, surveys, and data systems that will provide them with the needed information to judge the success of Teacher Preparation programs that are authorized by their State.

Comment: One commenter opined that authorizing The Higher Education Act will enable the Department to compare the number of teachers entering the field with the number of teachers retiring to ensure that States are able to avert hiring crises. The commenter felt that presenting data trends on education and teachers across the country would encourage people to become less interested in being educators. Presenting these trends with an established routine would create great benefits.

Response: No change. We agree with the commenter that the required data reporting requirements will provide important information on the success and strength of Teacher Preparation programs. While the Department does not have the ability to reauthorize the Higher Education Act, this data collection was developed with the intention of strengthening teacher education throughout the country.