

Summary of Public Comments on the Title II State Report Card Public following the 60-Day comment period for Docket #ED-2019-ICCD-0066 (OMB #: 1840-0744)

Elizabeth Ross

Attached comments were a second copy of those by Kate Walsh.

Kate Walsh, NCTQ

Comment:

1. Section I: Enrollment and Program Completers (See Numbers 10 and 30) Add for each licensure test:
 - a. number of first-time test-takers; and
 - b. first-time pass rate for all test-takers enrolled in a program.

Discussion: These items are not required in the statute. The Department has no authority to ask for them in the IPRC.

Action Taken: None.

Comment:

2. Section I: Program Information - List of Programs (See Number 5 and 26) Aggregate and collect information on undergraduate and postgraduate programs and present these data in a manner that is sortable by provider type and level (pre- and post-baccalaureate).

Discussion: In Section I: List of Programs, each unique program is identified as offered at the undergraduate level, postgraduate level, or both. Data are made publicly available in Excel files, allowing interested parties to aggregate, sort, and analyze.

Action Taken: None.

Comment:

3. Section II: Credential Requirements – (See Number 19 and 38) Add to the Glossary of Key Terms:
 - a. emergency credential;
 - b. temporary credential; and

- c. provisional credential.

Discussion: Adding definitions does not increase burden nor is it an action that requires statutory demand.

Action Taken: The Department will consider adding.

Matt Walker, Teach For America

Comment:

- 4. Encourage collection and disaggregation of Asian American, Native Hawaiian, and Pacific Islander (AANHPI) data.

Discussion: Doing so would require collecting data beyond what is required in the statute.

Action Taken: None

Melissa Tooley, New America

Comment:

- 5. Section I: List of Programs and Program Requirements - (See numbers 2 and 26) Aggregate and collect information on undergraduate and postgraduate programs.

Discussion: In Section I: List of Programs, each unique program is identified as offered at the undergraduate level, postgraduate level, or both. Data are made publicly available in Excel files, allowing interested parties to aggregate, sort, and analyze.

Action Taken: None.

Comment:

- 6. Section I: List of Programs - Enable sorting by provider type as well as by pre- vs. post-baccalaureate level.

Discussion: All teacher preparation provider data are identified and sortable by provider type in the proposed instruments; IHEs that have both traditional and alternative programs complete and submit a separate report for each provider type, and that disaggregation continues through in the State Report Card. Some data elements, such as the list of programs and entry/exit requirements, are further disaggregated by undergraduate and postgraduate, and for those data elements. Data are made publicly available in Excel files, allowing interested parties to aggregate, sort, and analyze.

Action Taken: None.

Comment:

- 7. Section I: List of Programs - (See Number 27) Provide definitions and collect data on various sub-types of “alternative” programs that explain each program’s individual approach to teacher preparation, such as residencies and fast-track models.

Discussion: These items are not required in the statute. The Department has no authority to ask for them in the IPRC.

Action Taken: None.

Comment:

8. Section I: Enrollment and Program Completers – (See Number 28 and 48) Provide Enrollment and Program Completers data broken out by program type (i.e., alternative vs. traditional, undergraduate vs. graduate).

Discussion: Enrollment and Program Completer data are broken out by program type in the current instrument. (However, these data elements are not broken down by undergraduate/postgraduate level.)

Action Taken: None.

Comment:

9. Section I: Enrollment and Program Completers –Collect:
 - a. (See Number 29) the number of individuals who were expected to complete in the most recent program year;
 - b. (See Number 47) the number of individuals who were expected to and did complete in the most recent program year;
 - c. the cohort completion rate within 100% of program length (defined as the number of individuals who were expected to and did complete in the most recent program year divided by the total number of individuals who were expected to complete in the most recent program year);
 - d. the cohort completion rate within 150% of expected program length;
 - e. the expected time to complete program (in years); and
 - f. the average time to complete program (in years).
 - g. Disaggregate by gender and race/ethnicity and by family income bracket (aligned with IPEDS net price data).

Discussion: (a – g) These items are not required in the statute. The Department has no authority to ask for them in the IPRC.

Action Taken: None.

Comment:

10. Section I: Enrollment and Program Completers - (See Number 1 and 30) Add for each licensure test:
 - a. number of first-time test-takers; and
 - b. first-time pass rate for all test-takers enrolled in a program.

Discussion: These items are not required in the statute. The Department has no authority to ask for them in the IPRC.

Action Taken: None.

Comment:

11. Section I: Teachers Prepared by Area of Credential – (See Number 31) Include instructions to ensure that states will provide statewide totals by area of credential, as well as totals by type of provider (traditional vs. alternative) in addition to the provider-level data currently requested on the form.

Discussion: Data are made publicly available in Excel files, allowing interested parties to aggregate, sort, and analyze.

Action Taken: None.

Comment:

12. Section I: Teachers Prepared by Area of Credential - Add a column to the end of the table labeled "Shortage Area (Y/N)" so that state staff can easily scan to see which preparation programs are preparing teachers to meet shortage areas as they complete current Section VII (Shortages). Move this sub-section to the end of Section I and move the current Section VII (Shortages) to immediately follow, so that the information flows in a logical manner.

Discussion: Shortage area data is collected in a different system. This would be redundant data.

Action Taken: None.

Comment:

13. Section I: Teachers Prepared by Subject Area, Teachers Prepared by Academic Major, and Program Assurances – (See Number 32) Include instructions to ensure that states will provide statewide totals by area of credential, as well as totals by type of provider (traditional vs. alternative) in addition to the provider-level data currently requested on the form.

Discussion: Data are made publicly available in Excel files, allowing interested parties to aggregate, sort, and analyze.

Action Taken: None.

Comment:

14. Section II: Assessing Program Performance – (See Number 33) Add surveys of program completers and surveys of program completers' employers.

Discussion: These items are not required in the statute. The Department has no authority to ask for them in the IPRC.

Action Taken: None.

Comment:

15. Section II: Assessing Program Performance – (See Number 34) Replace the criterion that says "Raising the standards for entry into the teaching profession" with "Raising the standards for entry into the teaching program".

Discussion: This item was determined from analysis of data on previous years' collections. Changing from profession to program would have a completely different meaning.

Action Taken: None.

Comment:

16. Section II: Assessing Program Performance – (See Number 35) Add at the end the instructions under “2, “Provide an explanation for why these measures were chosen.”

Discussion: These items are not required in the statute. Additionally, including would increase burden.

Action Taken: None.

Comment:

17. Section II: Assessing Program Performance – (See Number 36) Encourage states to indicate which assessment the pass rate benchmark applies to in the example for “Pass rates on state assessments” (e.g., “Below 80% on x assessment(s)”).

Discussion: These items are not required in the statute. Additionally, asking would increase burden.

Action Taken: None.

Comment:

18. Section II: Teachers Credentialed – (See Number 37) Add a row for the total number of persons receiving an additional teaching credential.

Discussion: These items are not required in the statute. The Department has no authority to ask for them in the IPRC. Additionally, asking would increase burden.

Action Taken: None.

Comment:

19. Section II: Credential Requirements (See Number 38)

- a. (See Number 3) #3: add the terms “emergency credential,” “temporary credential,” and “provisional credential” to the Glossary of Key Terms at the end of the form.

Discussion: Adding definitions does not increase burden nor is it an action that requires statutory demand.

Action Taken: The Department will consider adding.

Comment:

- b. #16: Insert the terms “completion of” before “state-approved.”

Discussion: The suggested insertion adds clarity without affecting burden or statutory requirements.

Action Taken: The Department will consider adding.

Comment:

- c. #17-21, 28: Insert the instruction "Describe." at the end of the question.

Discussion: On the online version of the survey, these are checkbox items. Having the responder add a description would increase burden and is not required by the statute.

Action Taken: None.

Comment:

- d. #24: Edit the question to say "Is passing National Board of Professional Teaching Standards assessment allowed or required? If yes, specify which."

Discussion: The checkboxes are Y/N format.

Action Taken: None.

Comment:

- 20. Section V: Assessment Information – (See Number 39) Why is the assessment information reported by program rather than statewide, given that the lowest possible score, highest possible score, and minimum passing score should be set by the assessment provider and/or state, and hence should be consistent across all preparation providers.

Discussion: This information is preloaded from the IPRC. The average for the state is calculated by the survey system.

Action Taken: None.

Comment:

- 21. Section V: Pass Rates and Scaled Scores – (See Number 40) Include the statewide median rather than (or in addition to) average, as this is a better snapshot measure (not so dependent on outliers).

Discussion: The statute only asks for average. The database is available to the public and a researcher desiring that information would be able to determine it.

Action Taken: None.

Comment:

- 22. Section VI: Alternative Routes – (See Number 41)

- a. #6: Add "for entry or exit" to the end of the first question, as some alternative routes are pre-baccalaureate and some are post-baccalaureate.
- b. #11: Clarify language to the end of the question. Is this referring to professional employment "during completion of the route" or employment at the end of the route.

Discussion: The suggested insertion adds clarity without affecting burden or statutory requirements.

Action Taken: The Department will consider adding.

Comment:

- c. Add a new question after #11 (new #12) "Is prior professional employment required? If yes, please specify."

Discussion: This item is not required in the statute. The Department has no authority to ask for it in the IPRC. Additionally, asking would increase burden.

Action Taken: None.

Comment:

23. Section VII: Teacher Shortages and Teacher Preparation – (See Number 42) Move this section to immediately follow Section I.

Discussion: In Section I: List of Programs, each unique program is identified as offered at the undergraduate level, postgraduate level, or both. Data are made publicly available in Excel files, allowing interested parties to aggregate, sort, and analyze.

Action Taken: None.

Comment:

24. Section IX: Improvement Efforts – (See Number 43) This section should not be preloaded from the state's prior year Report Card as states may inadvertently submit this section without changes from the prior year.

Discussion: Survey respondents are required to certify that the information contained in the survey is accurate and complete.

Action Taken: None.

Comment:

25. Section IX: Improvement Efforts – (See Number 44) Include an "Other" row in the activity/initiative checklist, and update the language preceding the text box to say "For any box checked above, describe the steps...".

Discussion: The answer choices were developed from analysis of answers in previous surveys. Adding "Other" would allow respondents to include additional options that may not have been reported previously.

Action Taken: The Department will consider adding.

Charles Barone, Education Reform Now

Comment:

26. Section I: List of Programs and Program Requirements – (See Numbers 2 and 5) Aggregate and collect information on undergraduate and postgraduate programs and present these data in a manner that is sortable by provider type and level (pre- and post-baccalaureate).

Discussion: In Section I: List of Programs, each unique program is identified as offered at the undergraduate level, postgraduate level, or both. Data are made publicly available in Excel files, allowing interested parties to aggregate, sort, and analyze.

Action Taken: None.

Comment:

27. Section I: List of Programs – (See Number 7) Provide definitions and collect data on various sub-types of “alternative” programs that explain each program’s individual approach to teacher preparation, such as residencies and fast-track models.

Discussion: These items are not required in the statute. The Department has no authority to ask for them in the IPRC.

Action Taken: None.

Comment:

28. Section I: Enrollment and Program Completers – (See Number 8 and 48) Provide Enrollment and Program Completers data broken out by program type (i.e., alternative vs. traditional, undergraduate vs. graduate).

Discussion: Enrollment and Program Completer data are broken out by program type in the current instrument. (However, these data elements are not broken down by undergraduate/postgraduate level.)

Action Taken: None.

Comment:

29. Section I: Enrollment and Program Completers – (See Number 9a) Collect the number of individuals who were expected to complete in the most recent program year but did not.

Discussion: These items are not required in the statute. The Department has no authority to ask for them in the IPRC.

Action Taken: None.

Comment:

30. Section I: Enrollment and Program Completers (See Numbers 1 and 10) Add for each licensure test:
- a. number of first-time test-takers; and
 - b. first-time pass rate for all test-takers enrolled in a program.

Discussion: These items are not required in the statute. The Department has no authority to ask for them in the IPRC.

Action Taken: None.

Comment:

31. Section I: Teachers Prepared by Area of Credential – (See Number 11) Include instructions to ensure that states will provide statewide totals by area of credential, as well as totals by type of provider (traditional vs. alternative) in addition to the provider-level data currently requested on the form.

Discussion: Data are made publicly available in Excel files, allowing interested parties to aggregate, sort, and analyze.

Action Taken: None.

Comment:

32. Section I: Teachers Prepared by Subject Area, Teachers Prepared by Academic Major, and Program Assurances – (See Number 13) Include instructions to ensure that states will provide statewide totals by area of credential, as well as totals by type of provider (traditional vs. alternative) in addition to the provider-level data currently requested on the form.

Discussion: Data are made publicly available in Excel files, allowing interested parties to aggregate, sort, and analyze.

Action Taken: None.

Comment:

33. Section II: Assessing Program Performance – (See Number 14) Add surveys of program completers and surveys of program completers' employers.

Discussion: These items are not required in the statute.

Action Taken: None.

Comment:

34. Section II: Assessing Program Performance – (See Number 15) Replace the criterion that says "Raising the standards for entry into the teaching profession" with "Raising the standards for entry into the teaching program".

Discussion: This item was determined from analysis of data on previous years' collections. Changing from profession to program would have a completely different meaning. Changing the position of sections would be a significant change in the survey instrument resulting in a cost outside of scope of the contract.

Action Taken: None.

Comment:

35. Section II: Assessing Program Performance – (See Number 16) Add at the end the instructions under "2, "Provide an explanation for why these measures were chosen."

Discussion: These items are not required in the statute. Additionally, asking would increase burden.

Action Taken: None.

Comment:

36. Section II: Assessing Program Performance – See Number 17) Encourage states to indicate which assessment the pass rate benchmark applies to in the example for “Pass rates on state assessments” (e.g., “Below 80% on x assessment(s)”).

Discussion: These items are not required in the statute. Additionally, asking would increase burden.

Action Taken: None.

Comment:

37. Section II: Teachers Credentialed – See Number 18) Add a row for the total number of persons receiving an additional teaching credential.

Discussion: These items are not required in the statute. Additionally, asking would increase burden.

Action Taken: None.

Comment:

38. Section II: Credential Requirements (See Number 19)

- a. (See Number 3) #3: add the terms “emergency credential,” “temporary credential,” and “provisional credential” to the Glossary of Key Terms at the end of the form.

Discussion: Adding definitions does not increase burden nor is it an action that requires statutory demand.

Action Taken: The Department will consider adding.

Comment:

- b. #16: Insert the terms “completion of” before “state-approved.”

Discussion: The suggested insertion adds clarity without affecting burden or statutory requirements.

Action Taken: The Department will consider adding.

Comment:

- c. #17-21, 28: Insert the instruction “Describe.” at the end of the question.

Discussion: On the online version of the survey, these are checkbox items. Having the responder add a description would increase burden and is not required by the statute.

Action Taken: None.

Comment:

- d. #24: Edit the question to say "Is passing National Board of Professional Teaching Standards assessment allowed or required? If yes, specify which."

Discussion: The checkboxes are Y/N format.

Action Taken: None.

Comment:

- 39. Section V: Assessment Information – (See Number 20) Why is the assessment information reported by program rather than statewide, given that the lowest possible score, highest possible score, and minimum passing score should be set by the assessment provider and/or state, and hence should be consistent across all preparation providers.

Discussion: This information is preloaded from the IPRC. The average for the state is calculated by the survey system.

Action Taken: None.

Comment:

- 40. Section V: Pass Rates and Scaled Scores – (See Number 21) Include the statewide median rather than (or in addition to) average, as this is a better snapshot measure (not so dependent on outliers).

Discussion: The statute only asks for average. The database is available to the public and a researcher desiring that information would be able to determine it.

Action Taken: None.

Comment:

- 41. Section VI: Alternative Routes – (See Number 22)
 - a. #6: Add "for entry or exit" to the end of the first question, as some alternative routes are pre-baccalaureate and some are post-baccalaureate.
 - b. #11: Clarify language to the end of the question. Is this referring to professional employment "during completion of the route" or employment at the end of the route.

Discussion: The Department will consider adding.

Action Taken: None.

Comment:

- c. Add a new question after #11 (new #12) "Is prior professional employment required? If yes, please specify."

Discussion: This item is not required in the statute. The Department has no authority to ask for it in the IPRC. Additionally, asking would increase burden.

Action Taken: None.

Comment:

42. Section VII: Teacher Shortages and Teacher Preparation – (See Number 23) Move this section to immediately follow Section I.

Discussion: Changing the position of sections would be a significant change in the survey instrument resulting in a cost outside of scope of the contract.

Action Taken: None.

Comment:

43. Section IX: Improvement Efforts – (See Number 24) This section should not be preloaded from the state’s prior year Report Card as states may inadvertently submit this section without changes from the prior year.

Discussion: Survey respondents are required to certify that the information contained in the survey is accurate and complete.

Action Taken: None.

Comment:

44. Section IX: Improvement Efforts – (See Number 25) Include an “Other” row in the activity/initiative checklist, and update the language preceding the text box to say “For any box checked above, describe the steps taken by the state during the past year to improve the quality of the current and future teaching force.”

Discussion: The answer choices were developed from analysis of answers in previous surveys. Adding “Other” would allow respondents to include additional options that may not have been reported previously.

Action Taken: The Department will consider adding.

Bayliss Fiddlman, Center For American Progress

Comment:

45. Section I: Enrollment and Program Completers – Collect race/ethnicity data for program enrollees AND program completers.

Discussion: The proposed instrument does this.

Action Taken: None.

Comment:

46. Provide a definition for the term “enrolled students.”

Discussion: The proposed instrument does this.

Action Taken: None.

Comment:

47. Section I: Enrollment and Program Completers (See Number 9b) Collect a cohort graduation rate which will clarify what percent of enrollees actually complete their teacher preparation programs on time.

Discussion: These items are not required in the statute. The Department has no authority to ask for them in the IPRC.

Action Taken: None.

Comment:

48. Section I: Enrollment and Program Completers – (See Number 8 and 28) Provide Enrollment and Program Completers data broken out by program type (i.e., alternative vs. traditional, undergraduate vs. graduate).

Discussion: Enrollment and Program Completer data are broken out by program type in the current instrument. (However, these data elements are not broken down by undergraduate/postgraduate level.)

Action Taken: None.