

# Public Comments Received During the 60-day Comment Period

January 2020

## National Teacher and Principal Survey of 2020-2021 (NTPS 2020-21)

ED-2019-ICCD-0148

Comments on FR Doc # 2019-25896

**Document:** ED-2019-ICCD-0148-0011

**Name:** Brian Reeder, Assistant Superintendent, Oregon Department of Education

Thank you for the opportunity to comment on the burden estimates for the 2020 - 2021 National Teacher and Principal Survey (OMB# 1850-0598 v.28). The NTPS 2020-21 will include state-level samples of schools. For Oregon, the number of expected completed school interviews is 104 (Supporting Statement Part B, Table 4). This means that a minimum of 104 Oregon schools will be approached to participate in the NTPS.

The Oregon Department of Education is concerned that the NTPS is scheduled for the same year as a state-level administration of the National Assessment of Educational Progress and the state's teacher environmental survey, the Teaching, Empowering, Leading, & Learning Survey (TELL) . Based on historical data, NAEP 2021 could include between 250 - 300 Oregon schools, and there do not appear to be overlap controls in place to prevent schools from being selected for both NAEP and NTPS. In addition, the TELL will include every educator in every school in the public K-12 system. Based on the NTPS sample questions, the TELL and the NTPS will overlap in content significantly. With data collections for both NAEP and NTPS in the field, the National Center for Education Statistics will have a very large footprint in Oregon during the 2020-2021 school year. Regarding the TELL, there is a duplication of effort. This is likely to result in an increase in complaints about the burden of federal and state studies from Oregon school administrators and educators.

The Oregon Department of Education respectfully requests that, in the future, the National Center for Education Statistics work in partnership with State Education Agencies to plan for efficient and non-duplicative administration of federal surveys in order to reduce burden on school administrators and educators in any given school year. The Oregon Department of Education also requests that the National Center for Education Statistics consistently utilize overlap controls to minimize the likelihood that schools are selected for both NAEP and another federal study such as the NTPS or international assessments.

Brian Reeder  
Assistant Superintendent  
Office of Child Nutrition, Research, Accountability, Fingerprinting, and Transportation  
Oregon Department of Education

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Dear Mr. Reeder,

Thank you for raising these concerns about the burden placed on schools sampled for NCES data collections. NTPS has designed questionnaires to omit duplicative items where possible, for example, using data from federal universe collections such as the Common Core of Data (CCD) and Civil Rights Data Collection (CRDC) instead of asking respondents to answer redundant questions. In addition, NCES sample surveys conducted during the same school year have coordinated their samples to minimize the likelihood that a given school is sampled in more than one collection, for example, when both NTPS and the School Survey on Crime and Safety (SSOCS) were administered during the 2017-18 school year.

The design of the NTPS allows comparisons to be made at the state level for important data about schools,

principals, and teachers. That is, while some content may be similar between NTPS and TELL, NTPS allows administrators, policymakers, and other stakeholders to compare data to a national benchmark and to other states or subgroups. To reduce burden, we collect data from representative samples in each state, rather than all schools. We believe that these data are beneficial to Oregon and other state education agencies, even with overlap in topics with data collections from some local and state education agencies. Please note that there are key differences in study design and populations of interest between NAEP and NTPS, however, in 2017 we began looking at ways to better coordinate these collections. We plan to continue this research subject to resource availability.

Sincerely,  
Maura Spiegelman  
National Teacher and Principal Survey  
Cross-Sectional Surveys Branch  
National Center for Education Statistics  
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**Document:** ED-2019-ICCD-0148-0012

**Name:** Roxanne Garza, Senior Policy Analyst, Education Policy Program, New America

To Whom it May Concern:

I am writing to comment on the proposed revisions to the National Teacher and Principal Survey, as set forth in the Federal Register notice ED-2019-ICCD-0148, on behalf of New America’s Education Policy Program. New America is an independent, non-profit policy and research organization, and its Education Policy Program works to strengthen and improve the educational system so that all individuals—from birth to workforce—have equitable access to high-quality learning that prepares them for college, careers, and civic life in a time of rapid technological and social change. We bring intentional and sustained attention to the students, families and communities that are least well served by existing educational policies and practices.

New America appreciates the Department of Education’s efforts to make changes to improve the National Teacher and Principal Survey, particularly the addition of questions related to teachers’ student loans and the questions related to virtual schools. While the National Teacher and Principal Survey has been useful in our research on educator quality, these comments offer additional recommendations for how the Department can further enhance the quality, utility, and clarity of the information to be collected.

## **C.2 Item Justification for the 2020-2021 NTPS Principal and Private Principal Questionnaire**

### *Insert New Item Number 1-3*

We recommend inserting a new item number 1-3 that asks principals whether they held other school leadership positions before they became a principal, in addition to the question asking if they previously held the position of assistant principal. We recommend the following item text: “BEFORE you became a principal, did you hold any other school leader position, including temporary positions?”

This change would make the questionnaire more consistent with the language in the Every Student Succeeds Act (ESSA). Per the ESSA, “school leader” is defined as “a principal, assistant principal, or other individual who is—(A) an employee or officer of an elementary school or secondary school, local educational agency, or other entity operating an elementary school or secondary school; and (B) responsible for the daily instructional

leadership and managerial operations in the elementary school or secondary school building.”<sup>1</sup> This would also help capture information as to whether the principal previously held a school leadership position that was not that of an assistant principal, and provide additional information about the various pathways by which people become principals.

#### Item Number 1-10

In the item text, we recommend defining “regularly taught” so that survey respondents can accurately respond to the question and individuals interpreting survey responses can clearly understand how much time is being spent by a principal on teaching classes.

#### Add Item Number 3-5

A growing number of states and districts are implementing principal induction programs in order to strengthen the quality and preparedness of principals, which in turn, impacts the recruitment, development, and retention of teachers.<sup>2</sup> We recommend adding a new item number 3-5 that asks principals whether they participated in an induction program, in addition to asking them whether teachers at their school participated in such a program. Policymakers and researchers can use this information to gauge the availability of such programs across the country. We recommend the following item text: “During your first or second year of the principalship, were you enrolled in a formal district-wide or statewide program aimed to enhance principals’ effectiveness by providing systematic support (sometimes called a principal induction program)?”

#### Insert New Item Number 4-3

We recommend adding a series of new items (4-3a-4-3g) that ask whether principals distribute tasks or responsibilities to staff on their school leadership team so that they can focus on the school’s biggest priorities (also known as distributed leadership).<sup>3</sup>

We recommend inserting a new item number 4-3a with the following text: “Specify the number of people on your school leadership team that you can delegate tasks to,” where “leadership teams are defined as the school-based employees who are involved in high-level school decision-making.”

We then recommend following up with item number 4-3b with the following text: “Do you feel that you can delegate and utilize the people on the leadership team fully?”

We recommend following item 4-3b with a list of questions that ask principals what types of tasks they delegate to their leadership team. We suggest the following new item numbers:

4-3c: “Please indicate which of the following tasks in this school you delegate to your leadership team.”

“Internal administrative tasks, including human resource/personnel issues, regulations, reports, school budget”

4-3d: “Curriculum and teaching-related tasks, including teaching, lesson preparation, classroom observations, mentoring teachers”

4-3e: “Student interactions, including discipline and academic guidance”

4-3f: “Parent interactions, including formal and informal interactions”

4-3g: “Other - please specify”

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<sup>1</sup> The Every Student Succeeds Act, Title VIII, General Provisions: Part A, Definitions,

<https://legcounsel.house.gov/Comps/Elementary%20And%20Secondary%20Education%20Act%20Of%201965.pdf>

<sup>2</sup> Roxanne Garza, *Guiding Principals: State Efforts to Bolster Instructional Leadership* (Washington, DC: New America, 2018), [https://na-production.s3.amazonaws.com/documents/Principal-Evaluation-Support\\_r2.pdf](https://na-production.s3.amazonaws.com/documents/Principal-Evaluation-Support_r2.pdf)

<sup>3</sup> Melissa Tooley, *From Frenzied to Focused: How School Staffing Models Can Support Principals as Instructional Leaders* (Washington, DC: New America, 2017), <https://www.newamerica.org/education-policy/policy-papers/frenzied-focused/>

### **C.3 Item Justification for the 2020-2021 NTPS School and Private School Questionnaire**

#### ***Item number 1-5e (private SQ)***

We recommend breaking up this question and first asking, “Of those who graduated with a diploma LAST school year (2019-2020), approximately what percentage enrolled in postsecondary education?” This would collect more holistic information about the percentage of students who enrolled in postsecondary education, whether it be at a two-year and four-year college.

We then recommend adding a new item number 1-5f that asks what percentage went to four-year colleges and adding a new item number 1-5g that asks what percentage went to two-year colleges.

We also recommend adding this set of questions in the public school questionnaire as it currently is only in the private school questionnaire.

### **C.4 Item Justification for the 2020-2021 NTPS Teacher and Private School Teacher Questionnaire**

#### ***Item Number 1-1***

In the response options for item number 1-1, we recommend replacing “Teacher aide” with “paraprofessional in a school” so that the questionnaire is consistent with the language in the ESSA. In the ESSA, “the term “paraprofessional” means ‘an individual who is employed in a preschool, elementary school, or secondary school under the supervision of a certified or licensed teacher, including individuals employed in language instruction educational programs, special education, and migrant education,” and “the term ‘paraprofessional’, also known as a ‘paraeducator’, includes an education assistant and instructional assistant.”<sup>4</sup>

#### ***Item Number 1-5***

In the response options for item number 1-5, we recommend adding “working as a paraprofessional in a school” as it would provide data on teachers’ work history and experience in schools that researchers use to examine teachers’ pathways to becoming a teacher. This pathway is particularly relevant as policymakers at the federal, state, and district level look to the paraeducator pool to recruit teachers.<sup>5</sup>

#### ***Item Number 2-2***

Item number 2-2 asks teachers how many students they teach that have an Individualized Education Program (IEP) because they have disabilities or have special needs. The item text also specifies not to include students who have only a 504 plan. We would like to better understand why the survey does not include students who have only a 504 plan, as students with diagnosed disabilities are covered by IEPs under IDEA, or by 504 plans under Section 504 of the Rehabilitation Act. Collecting data on students with IEPs but excluding students on 504 plans undercounts the number of students with disabilities teachers are serving. This skewing of data will grow as the number of students served by 504 plans continues to increase. CRDC data show that the numbers more than doubled from 2006 to 2014.<sup>6</sup>

#### ***Add Item Number 3-5h***

Students of color now make up the majority of the public school student population, but curriculum and teaching practices have not been updated to meet the needs of these students. Some teachers say they have not been adequately trained on how to support racial and ethnic diversity in the classroom,<sup>7</sup> which can play a critical

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<sup>4</sup> The Every Student Succeeds Act, Title III—Language Instruction for English Learners and Immigrant Students: Part B, General Provisions; Title VIII, General Provisions: Part A, Definitions, <https://legcounsel.house.gov/Comps/Elementary%20And%20Secondary%20Education%20Act%20Of%201965.pdf>

<sup>5</sup> Kaylan Connally, Amaya Garcia, Shayna Cook, and Conor P. Williams, *Teacher Talent Untapped: Multilingual Paraprofessionals Speak About the Barriers to Entering the Profession* (Washington, DC: New America, 2017), <https://www.newamerica.org/education-policy/policy-papers/teacher-talent-untapped/>

<sup>6</sup> Civil Rights Data Collection, *State and National Estimations* (Washington, DC: U.S. Department of Education, 2018), <https://ocrdata.ed.gov/StateNationalEstimations>

<sup>7</sup> Jahque Bryan-Gooden and Megan Hester, *Is NYC Preparing Teachers to be Culturally Responsive?* (New York, NY: NYU Steinhardt, 2018), <https://research.steinhardt.nyu.edu/scmsAdmin/media/users/atn293/coe/>

role in students' overall achievement. We recommend adding item number 3-5h with item text, "How to use culturally responsive teaching practices?" to the list of undergraduate or graduate courses that teachers are questioned about. Culturally responsive teaching is generally defined as a way of teaching that ensures students' everyday experiences and racial, ethnic, and cultural backgrounds are reflected in the classroom.<sup>8</sup>

#### Item Number 3-6c

We recommend making changes to the response options for item number 3-6c to include an option that is "12-15 weeks" and to add an option of "16 weeks or more."

For respondents that said that they student taught for "16 weeks or more," we recommend the following subsequent questions:

3-6d: "Did you complete a year-long, school-based residency program?"

3-6e: "Were you compensated for that year-long school-based residency?"

#### Item Number 4-1

We recommend adding subsequent questions under item number 4-1 in order to better understand the type of preparation received in the alternative route to certification program. It would be helpful to know whether a teacher was required to demonstrate pedagogical or instructional knowledge as part of their alternative route program.

Suggested questions include:

- 4-1a: "If you entered teaching through an alternative route to certification program, were you required to demonstrate knowledge and/or competency in content or pedagogy before completion of your alternative route program?"
- 4-1b: "If you entered teaching through an alternative route to certification program, please indicate which of the following requirements you had to satisfactorily complete before being allowed to enter the classroom:  
Subject certification test
- 4-1c: General certification test
- 4-1d: Pedagogical assessment
- 4-1e: Portfolio
- 4-1f: Classroom demonstration
- 4-1g: Industry work experience practicing the subject outside the classroom
- 4-1h: Other - Please specify

#### Add Item Number 4-4

In the "certification section of the teacher questionnaire, we recommend adding item number 4-4a that asks the survey respondent whether they are currently teaching in the content area and/or grade range that they were prepared and certified in. This information will support educators, policymakers, and researchers address questions related to teacher quality such as in-field/out-of-field teaching and other subject-specific analyses.<sup>9</sup>

We recommend the following item text: "Are you currently teaching any classes outside of the content area and/or grade range for which you were certified to teach?"

4-4b: "Have you ever taught any classes outside of the content area and/or grade range for which you were certified to teach?"

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Metro\_Center\_Teacher\_Survey\_Results\_FINAL.pdf

<sup>8</sup> Jenny Muniz, *Culturally Responsive Teaching: A 50-State Survey of Teaching Standards* (Washington, DC: New America, 2019), <https://www.newamerica.org/education-policy/reports/culturally-responsive-teaching/understanding-culturally-responsive-teaching/>

<sup>9</sup> *Teaching Out-of-Field: An Overlooked Factor in Underqualified Teaching* (Washington, DC: ASCD, 2003), <http://www.ascd.org/publications/researchbrief/v1n05/toc.aspx>

4-4c: “If you have taught classes outside of the content area and/or grade range for which you were certified to teach, for how long?” Include a write-in response for number of months.

#### Item Number 5-2

In the response options for item number 5-2, we recommend adding “working as a paraprofessional in a school” as it would provide data on teachers’ work history and experience in schools that researchers use to examine teachers’ pathways to becoming a teacher. This pathway is particularly relevant as policymakers at the federal, state, and district level look to the paraeducator pool to recruit teachers.<sup>10</sup>

#### Item Number 5-4d

In the text for item number 5-4d, we recommend replacing the term “computer” with the term “technology” as the term “computer” is limiting to the type of technology that a teacher may use to augment classroom instruction. Teachers may use a variety of digital tools in their classrooms such as computers, mobile phones, tablets, and e-book readers.<sup>11</sup>

#### Add Item Number 5-4K

Students of color now make up the majority of the public school student population, but curriculum and teaching practices have not been updated to meet the needs of these students. Some teachers say they have not been adequately trained on how to support racial and ethnic diversity in the classroom,<sup>12</sup> which can play a critical role in students’ achievement. We recommend adding item number 5-4K with item text, “Use culturally responsive teaching practices?” to the list of tasks that a teacher was prepared for during their first year of teaching. Culturally responsive teaching is generally defined as a way of teaching that ensures students’ everyday experiences and racial, ethnic, and cultural backgrounds are reflected in the classroom.<sup>13</sup>

#### Item Number 7-4

Teacher and principal turnover have been proven to negatively impact schools and students—leading to poor staff morale and negatively impacting student outcomes.<sup>14</sup> And principal turnover can influence teacher turnover, and vice versa. Chronic teacher turnover can lead to principal burnout, and this is a particular concern for high-need schools where teachers in the hiring pool are more likely to be new to the profession.<sup>15</sup> In these instances, principals are forced to spend time hiring and training new teachers rather than investing in existing teachers and building their skill sets. There are also a host of other reasons that a teacher may decide to leave their school. In order to better understand the school climate and culture, we recommend adding the following item numbers as problems that teachers can identify in their schools:

#### 7-4k: “Principal turnover”

<sup>10</sup> Kaylan Connally, Amaya Garcia, Shayna Cook, and Conor P. Williams, *Teacher Talent Untapped: Multilingual Paraprofessionals Speak About the Barriers to Entering the Profession* (Washington, DC: New America, 2017), <https://www.newamerica.org/education-policy/policy-papers/teacher-talent-untapped/>

<sup>11</sup> Kristen Purcell, Judy Buchanan, and Linda Friedrich, *How Teachers are Using Technology at Home and in Their Classrooms* (Washington, DC: Pew Research Center, 2013), <https://www.pewresearch.org/internet/2013/02/28/how-teachers-are-using-technology-at-home-and-in-their-classrooms/>

<sup>12</sup> Jahque Bryan-Gooden and Megan Hester, *Is NYC Preparing Teachers to be Culturally Responsive?* (New York, NY: NYU Steinhardt, 2018), [https://research.steinhardt.nyu.edu/scmsAdmin/media/users/atn293/coe/Metro\\_Center\\_Teacher\\_Survey\\_Results\\_FINAL.pdf](https://research.steinhardt.nyu.edu/scmsAdmin/media/users/atn293/coe/Metro_Center_Teacher_Survey_Results_FINAL.pdf)

<sup>13</sup> Jenny Muniz, *Culturally Responsive Teaching: A 50-State Survey of Teaching Standards* (Washington, DC: New America, 2019), <https://www.newamerica.org/education-policy/reports/culturally-responsive-teaching/understanding-culturally-responsive-teaching/>

<sup>14</sup> Matthew Ronfeldt, Susanna Loeb, and James Wyckoff, *How Teacher Turnover Harms Student Achievement*, <https://journals.sagepub.com/doi/pdf/10.3102/0002831212463813>

<sup>15</sup> *The Effects of Chronic Teacher Turnover on School Climate and Organization* (Washington, DC: ASCD, 2004), <http://www.ascd.org/publications/researchbrief/v2n19/toc.aspx>, and Douglas Gagnon and Marybeth J. Mattingly, *Beginning Teachers Are More Common in Rural, High-Poverty, and Racially Diverse Schools* (Durham, New Hampshire: Carsey Institute, 2012), <https://scholars.unh.edu/cgi/viewcontent.cgi?article=1172&context=carsey>

7-4l: “Teacher turnover”

7-4m: “Teacher disengagement”

7-4n: “Principal disengagement”

7-4o: “Low educator expectations for students”

7-4p: “Lack of support from school leadership”

7-4q: “Lack of support from peers”

We also recommend replacing the word “apathy” in item number 7-4f and replacing it with “disengagement” as this term is more commonly used to describe student and staff in education.

*Insert New Item Number 8-14*

Teachers may have had access to the Teacher Education Assistance for College and Higher Education (TEACH) Grant program while they were students. The program allows students who are interested in teaching to be eligible for approximately \$4,000 per year in grant form, either for a bachelor’s degree or a master’s degree. The grant obligates grantees to work in key subject areas in high-need schools for at least four years within the first eight years after they leave college. If they fail to fulfill their service obligation, the grant money is converted to a loan, and all the interest that would have accrued from the date the grant was disbursed is tacked onto the loan. We recommend adding a new item number 8-14 with the following item text: “Were you a recipient of the federal Teacher Education Assistance for College and Higher Education (TEACH) Grant?”

We also recommend adding a subsequent item 8-14a with the following item text: “Are you currently satisfying your service obligation?” and 8-14b “Have you completed your service obligation?”

This data collection would help policymakers and researchers to better understand who accesses federal TEACH grants and what their current status is with the grant/loan program.

*Insert New Item Number 8-15*

As more states and/or districts develop loan forgiveness programs in order to attract and retain teachers,<sup>16</sup> it would be helpful to understand whether teachers are currently accessing such programs. We recommend adding a new item number 8-15 with the following item text: “Are you enrolled in any district or state-based teacher loan forgiveness programs?” This type of data collection would help policymakers and researchers to better understand the availability and uptake of such programs.

Thank you for considering these comments. If you have any questions or concerns regarding our comments, please do not hesitate to contact New America by phone at 202-986-4901, or via email at [garzar@newamerica.org](mailto:garzar@newamerica.org).

Roxanne Garza,  
Senior Policy Analyst  
Education Policy Program

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<sup>16</sup> Bayliss Fiddiman, Colleen Campbell, and Lisette Partelow, Student Debt: An Overlooked Barrier to Increasing Teacher Diversity (Washington, DC: Center for American Progress, 2019), <https://www.americanprogress.org/issues/education-postsecondary/reports/2019/07/09/471850/student-debt-overlooked-barrier-increasing-teacher-diversity/>

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Dear Ms. Garza,

We appreciate your detailed feedback on the NTPS questionnaires. Items in these questionnaires regularly undergo cognitive testing with school administrators and teachers to ensure that questions are being interpreted consistently and as they were intended. For example, we have found that principals understand the term “regularly taught” in item 1-10, particularly after the addition of the instruction to “Exclude short term substitute teaching.”

Your suggestions of new questionnaire items reflect areas we would like to explore in more detail. Among other content areas, we will explore the collection of additional information on principal training (including induction programs), particularly integrating that topic into a series of questions on principals’ professional development that will be included in the 2023-24 NTPS. For teachers, your suggestions to capture teacher training on culturally responsive teaching practices, update our references to “computers” to either a general term such as “technology” or provide specific examples of non-computer technology, teachers’ perceptions of the impact of staff turnover and other factors that may lead to poor morale, and plans regarding specific loan forgiveness programs identify emerging topics or content areas on which we are attempting to deepen our data collections, and we’re grateful for your perspective as an education researcher.

We will explore the addition of these proposed questions and modifications further for the next collection of NTPS during the 2023-24 school year. Cognitive testing and questionnaire development activities will next take place in 2021 and 2022. In order to maintain data quality and avoid overburdening respondents, any additions or modifications to the questionnaires that may affect how they are interpreted will undergo this testing process before they are implemented.

Sincerely,  
Maura Spiegelman  
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