HEA Title II Report Cards on State Teacher Credentialing and Preparation
Responses to 60-day FRN Public Comments
1840-0744
October 23, 2026

Public Comment File # ED-2026-SCC-2707-0006 Comment on FR Doc # 2026-17081	#1
Date Comment Received	October 04, 2026
Date Comment Posted	October 16, 2026
Category: Simple or Multiple Comments	Simple
Comment Type (Choose 1): Fax, Letter, Email, Post Card, Other	Email
Author's Name	Barbara Richards
Author's Affiliation (if available)	Accreditor - Specialized/Programmatic
Sponsoring Organization (if available)	NA
Comment Received	I am a retired public school teacher. I ask for clarification of the revisions to the annual Title II reports used to collect and publish information about teacher preparation programs and state teacher credentialing systems. ED says the revision will remove several items it considers "no longer needed" and update reporting instructions to reflect the Department's current organizational structure, but the notice does not identify which data elements are being eliminated. These "details" need to be clarified before these actions are taken. It seems that what the new administration declares as unnecessary is often what I as a citizen deem as quite significant. I have found these revisions coming from this administration ignore current science and established practice. Furthermore, these revisions often nullify legislation that Congress has approved, thus creating a breach of law. So what are the changes? How can we respond with reason and data if we are called to "trust" or "not believe our eyes?"
Date You Responded	October 28, 2026
Document Your Response	We received your comments, and they have been annotated in our records. The Department has proposed the following changes to the HEA

	Title II Report Cards on State Teacher Credentialing and Preparation information collection. 1. The IPRC and SRC "redline" Instructions reflect that the office responsible for the collection has changed from the Office of Postsecondary Education to the Office of the Chief Data Officer. 2. The Supporting Statement was updated to remove the URLs that will not be valid for the collection. 3. The Department removed questions on the impacts of COVID-19 from both the SRC and IPRC, determined to be no longer needed. This, along with an adjustment to ED's estimate of the number of hours required for each instrument has resulted in a reduction in the expected burden of this collection. The number of expected responses has also been updated to reflect the number of programs requiring response in recent years. 4. The Department removed the "Non-Binary/Other" field in the Section Enrollment and Program Completers disaggregated by Gender from the IPRC and SRC. 5. The applicable Academic Year (AY) for the information collection were updated to AY 2025-2026, 2026-2027, and 2027-2028 in the IPRC Annual Goals section.
File Name of Public Comment	

Public Comment File # ED-2026-SCC-2707-0007 Comment on FR Doc # 2026-17081	#2
Date Comment Received	October 19, 2026
Data Comment Posted	October 20, 2026
Category: Simple or Multiple Comments	Simple
Comment Type (Choose 1): Fax, Letter, Email, Post Card, Other	Email
Author's Name	Terry Stoops
Author's Affiliation (if available)	Institution of Higher Education

Sponsoring Organization (if available)	Defending Education
Comment Received	No other factor influences educational quality more than the skills and capabilities of classroom educators. But regrettably, the Higher Education Act (HEA) Title II Report Cards on State Teacher Credentialing and Preparation do not evaluate the relative quality of our nation's teacher preparation programs, nor do they provide satisfactory insight into the intellectual foundations and ideological frameworks inculcated in prospective educators. While collecting descriptive data on teacher preparation programs is necessary for the proper functioning of the U.S. Department of Education, it is not sufficient. Because the nation's nearly 100,000 public schools rely on our teacher preparation programs to staff their classrooms, taxpayers deserve to know much more about these programs than just the number of enrollees, programs, providers, program completers, and general demographic, certification, and licensure data in each state, territory, and jurisdiction. Indeed, the term "Title II Report Cards" is a misnomer because the current report cards contain no grades, ratings, or other forms of assessment. A proper report card would include multiple measures of performance for all teacher preparation programs included in the report. Unfortunately, the only evaluative indicator included on the Title II Report Cards is "at-risk" or "low-performing" classifications, which vary by the criteria each state establishes. According to the Report on Teacher Workforce 2023,approximately 1% of programs were low-performing or at risk of being low-performing in 2019-2020.That means that the quality of 99% of the programs identified in the Title II Report Cards is unknown. A proper Title II report card would evaluate teacher preparation programs based on available metrics, including certification and licensure data, disciplinary records, graduate retention rates, performance evaluations, and, when available, student outcome measures. In addition, annual randomized surveys of teacher preparation program graduates, both employed in the teaching profession and those who have changed professions, would provide much-needed context to qualitative measures of institutional performance. For decades, the federal government has measured student performance through the National Assessment of Educational Progress (NAEP), also known as The Nation's Report Card. The U.S. Department of Education should create similar Title II Report Cards that provide timely, high-quality evaluations of the nation's teacher preparation programs. Title II report cards should also offer details about coursework offered by teacher preparation programs. All teacher preparation programs publish catalogs that describe required and elective courses offered to undergraduate, graduate, and alternative licensure students. Thus, requesting this information does not impose an extraordinary burden on the institutions or the state agency personnel who collect it on behalf of the state. Including

	course descriptions in the Title II report card would offer invaluable insight into the academic rigor of teacher preparation programs and the potential ideological biases associated with those programs. Make no mistake that teacher preparation programs are rife with ideological bias. In 2024, Defending Education published CorruptED: Colleges of Education and the Teacher as Activist Pipeline. Using college of education syllabi and course descriptions from 67 institutions ranging from small private colleges to large state institutions and elite universities, the report detailed what America's current and future K-12 educators are being taught in colleges of education across the country. CorruptED revealed the shocking infiltration of radical left-wing ideologies in undergraduate and graduate education courses. This ideologically charged instruction has undermined the quality of teacher education programs by diverting resources from critical course content in areas such as classroom management, instructional delivery, and student assessment. In 2026, Defending Education published a supplement to the CorruptED report documenting the Southern Poverty Law Center's (SPLC) ideological infiltration into teacher preparation programs. At least 100colleges of education in 38 states and the District of Columbia incorporated SPLC's Learning for Justice resources, lessons, and Social Justice Standards in pre-service teacher preparation programs, coursework, departmental frameworks, and educator training initiatives. Finally, a recent Defending Education investigation found that the Massachusetts Department of Elementary and Secondary Education's (DESE) guidelines for "Educator Preparation" programs, "Candidate Assessment of Performance," and "Professional Teaching Standards" require incorporating"
Date You Responded	October 28, 2026
Document Your Response (see above instructions)	We received your comments, and they have been annotated in our records. At this time, the Department plans to proceed with only asking Institutions and States to report the items required under Title II of the Higher Education Act of 1965, as amended (HEA), of the State Report Card (SRC) and Institution and Program Report Cards (IPRC) in section 205(a) and (b).
File Name of Public Comment	

Public Comment File # ED-2026-SCC-2707-0008	#3

Comment on FR Doc # 2026-17081	
Date Comment Received	October 20, 2026
Data Comment Posted	October 21, 2026
Category: Simple or Multiple Comments	Simple
Comment Type (Choose 1): Fax, Letter, Email, Post Card, Other	Email
Author's Name	Andrew Huff
Author's Affiliation (if available)	NA
Sponsoring Organization (if available)	Risk Factor Research, LLC
Comment Received	I write in my individual capacity on the Department's proposed renewal of the Higher Education Act (HEA) Title II Report Cards on State Teacher Credentialing and Preparation. I am an epidemiologist and a former Assistant Professor at Michigan State University, where I designed randomized controlled trials and observational studies and taught graduate courses; measuring outcomes is my method. The strongest case for this collection is simple: Congress required public report cards on teacher preparation, and they are among the few places where a prospective teacher, a school district, or a parent can compare programs on common terms. The State Report Card, the Institution and Program Report Card, and the Secretary's Report to Congress on Teacher Quality built from them are accountability the public is owed. I support renewing the collection. My recommendations concern how to make it cheaper to file and more informative to read. **Summary of recommendations** 1. Correct the description of the action in the 30-day notice, and list each item removed with the reason it is no longer needed. 2. Show which items drive the 185,000-hour estimate, re-estimate burden after the removals, and cut items whose use cannot be shown. 3. Encourage States to report, under definitions they choose and publish, outcome measures of program quality: completer placement and retention in teaching, licensure pass rates including first-attempt rates, and, where a State has the data, measures of graduates' classroom effectiveness. 4. Publish a short, structured data quality note with each report card. 5. Apply the same measures to programs outside institutions of higher education, and count placement in every school setting a State's data reach.

	(a) Necessity and practical utility The collection is necessary; the statute requires it. Its utility depends on the public being able to see what is collected and what is changing. The notice's summary describes the action as "an extension without change of a currently approved information collection request," while the Type of Review line reads "Revision of a currently approved ICR" and the abstract states: "This revision request removes several items no longer needed and updates some reporting instructions to reflect current ED organization structure." The substance described is a revision. The summary line is most likely a drafting slip, but it matters: a reader who relies on the summary would conclude that nothing is changing and would not look for removals. The notice also does not identify the removed items. I ask that the 30-day notice correct the summary and list each item removed, with a sentence on why it is no longer needed, so that the public can comment on what is actually being dropped. **(b) Accuracy of the burden estimate** The notice estimates 2,283 annual responses and 185,000 annual burden hours. Those are the same figures carried in the current OMB inventory for this collection, even though several items are being removed. Either the removed items carried negligible burden or the estimate was not re-run; the 30-day notice should say which. At roughly 81 hours per response on average, this is a heavy collection, and the hours are unlikely to fall evenly across items. I ask the Department to show, by report card and by section, where the hours fall, and to cut items that consume meaningful time without a demonstrated use in the Secretary's report, in State program review, or by the public. **(c) Enhancing quality, utility, and clarity** The report cards already carry enrollment figures, completion rates, assessment pass rates, and each State's classification of programs as "at-risk or low-performing." Those are useful, but they are mostly measures of entry and gateways: whether candidates enrolled, finished, and passed a test. They do not show whether a program prepared its graduates to teach. The measures that answer that question are outcomes: the share of completers placed in teaching positions, the share still teaching after three and five years, licensure pass rates with first-attempt rates reported alongside any cumulative rate, and, where a State has built the data systems to do it responsibly, measures of graduates' effectiveness in the classroom. I recommend that the Department encourage States to report these as each State chooses to define and collect them, with definitions published, as a matter of State choice and not as a federal requirement. Retention is especially probative, because a program whose completers seldom remain in teaching after three years may not be meeting the need it exists to serve. Every outcome rate also needs a note on the data behind it. Each report card should carry a short structured data quality note: the share of completers the

State could match to employment records, the share of records with missing fields, and any change in definitions from the prior year. Without it, a high placement rate on a small matched sample reads the same as a high rate on the full cohort.

(d) Minimizing burden, including through information technology

Fixed reporting costs weigh most on small programs. Prefilling fields that States already hold from licensure and assessment records, accepting machine-readable submissions with built-in validation, and carrying forward unchanged program descriptions from the prior year would reduce hours without reducing information. Outcome measures, where States choose to report them, should come from administrative records States already maintain rather than from new surveys of programs.

Beyond the PRA: an outcomes standard

Reporting should let the public see which programs produce teachers who are placed and who stay. That is an outcomes standard, not a judgment about any type of institution or any approach to preparing teachers: a program that places and keeps effective teachers should be able to show it, and a program that cannot should know where it stands. Because this collection already reaches teacher preparation programs outside institutions of higher education, the same measures should apply to those alternative routes on equal terms, and placement and retention should count completers teaching in every school setting a State's data reach.

Scope and confidence

This comment addresses the reporting design described in the notice. It does not address the specific items proposed for removal, which the notice does not identify, or the criteria States use to classify programs. My confidence is high that the summary and the Type of Review line are inconsistent and that the 30-day notice should list removals, and high that outcome measures and data quality notes would make the report cards more informative. It is moderate on how far States can produce classroom effectiveness measures at acceptable cost, which varies widely by State.

Disclosure: I have no financial interest in any teacher preparation program, institution, vendor, or contract connected to this collection, and I was not compensated for this comment.

Thank you for the opportunity to comment.

Respectfully,

Andrew G. Huff, Ph.D., M.S.

Risk Factor Research, LLC

References

	1. U.S. Department of Education. Agency Information Collection Activities; Comment Request; Higher Education Act (HEA) Title II Report Cards on State Teacher Credentialing and Preparation. 91 FR 54318, August 21, 2026. FR Doc. 2026-17081. https://www.govinfo.gov/content/pkg/FR-2026-08-21/html/2026-17081.htm 2. Office of Information and Regulatory Affairs. ICR Reference No. 202303-1840-002, Higher Education Act (HEA) Title II Report Cards on State Teacher Credentialing and Preparation, OMB Control No. 1840-0744, concluded November 27, 2023. https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202303-1840-002
Date You Responded	October 28, 2026
Document Your Response (see above instructions)	We received your comments, and they have been annotated in our records. The "type of review" has been updated to a Revision. The Department has proposed the following changes to the HEA Title II Report Cards on State Teacher Credentialing and Preparation information collection. 1. The IPRC and SRC "redline" Instructions reflect that the office responsible for the collection has changed from the Office of Postsecondary Education to the Office of the Chief Data Officer. 2. The Supporting Statement was updated to remove the URLs that will not be valid for the collection. 3. The Department removed questions on the impacts of COVID-19 from both the SRC and IPRC, determined to be no longer needed. This, along with an adjustment to ED's estimate of the number of hours required for each instrument has resulted in a reduction in the expected burden of this collection. The number of expected responses has also been updated to reflect the number of programs requiring response in recent years. 4. The Department removed the "Non-Binary/Other" field in the Section Enrollment and Program Completers disaggregated by Gender from the IPRC and SRC. 5. The applicable Academic Year (AY) for the information collection were updated to AY 2025-2026, 2026-2027, and 2027-2028 in the IPRC Annual Goals section. The burden estimate change reflects a reduction in an estimated 3 hours per IPRC with the removal of COVID-19 questions and an increase in the number of IPRCs reported to over 2,200 providers. At this time, the Department plans to proceed with only asking

	Institutions and States to report the items required under Title II of the Higher Education Act of 1965, as amended (HEA), of the State Report Card (SRC) and Institution and Program Report Cards (IPRC) in section 205(a) and (b).
File Name of Public Comment	

Public Comment File # ED-2026-SCC-2707-0009 Comment on FR Doc # 2026-17081	#4
Date Comment Received	October 20, 2026
Date Comment Posted	October 21, 2026
Category: Simple or Multiple Comments	Simple
Comment Type (Choose 1): Fax, Letter, Email, Post Card, Other	Email
Author's Name	Anonymous Anonymous
Author's Affiliation (if available)	NA
Sponsoring Organization (if available)	NA
Comment Received	The framework changes how occupations and CTE programs are categorized: it moves from 16 career clusters to 14 and introduces 72 sub-clusters. For example, the previous Health Science and Human Services clusters are combined into Healthcare & Human Services; Government and Public Administration and Law, Public Safety, Corrections & Security are combined into Public Service & Safety. The notice does not provide a field-by-field comparison of the old and proposed forms. It identifies the intended changes but does not enumerate precisely what financial information will be dropped, what reporting fields will be altered, or how the revised forms will differ line by line.
Date You Responded	October xx, 2026
Document Your Response (see above instructions)	We received your comments, and they have been annotated in our records. The Higher Education Act Title II Report Cards on State Teacher Credentialing and Preparation does not ask questions about nor does it compare occupations and CTE programs other than postsecondary and

	alternative teacher preparation programs.
File Name of Public Comment	