

*Teacher Education Division  
Council for Exceptional  
Children*



March 29, 2013

Dr. Jim Cibulka, President

Council for the Accreditation of Education Preparation

2012 Massachusetts Avenue

Suite 500

Washington, DC 20036

Dear Dr. Cibulka,

We are pleased to submit comments on the proposed CAEP standards on behalf of the Higher Education Consortium for Special Education (HECSE) and the Teacher Education Division (TED) of the Council for Exceptional Children (CEC).

HECSE is comprised of 65 universities with doctoral programs in special education. Our member institutions are at the forefront of teacher education, research and development in special education. TED is one of 17 special interest groups comprised of CEC members who are dedicated to the preparation and development of future special educators. Over 2500 strong, TED members lead and support teacher education on behalf of students with exceptional needs and their families.

The adoption of new standards for educator preparation programs is a keen opportunity for the educator preparation field to express unification around a set of agreed upon standards for program approval which represent professional consensus of our field. As organizations representing special education in higher education, we bring the perspective of our field forward to contribute to that consensus development.

**General comments:**

- The five standards represent the five critical key areas for consideration in determining program accreditation.
- In several instances, the standards appear to hold preparation programs accountable for variables outside of their control (examples below).
- The accreditation process appears to be expanding to include consideration of variables that may or may not be linked to program excellence and effectiveness (examples below).

- The capacity of programs to provide the newly required information is lacking in many instances (examples below); therefore holding programs accountable for information that they do not have and cannot secure is problematic.
- Without specific rubrics and a more detailed articulation of what will count as evidence for the different standards and what the thresholds will be, it is challenging to provide specific detailed feedback.

### **Standard 1: Content and Pedagogical Knowledge**

- The mastery of research based practices to ensure that the needs of a diverse range of learners are met is lacking. We recommend adding a requirement that all candidates become proficient in utilizing research based instructional practices, such as Universal Design for Learning (UDL) and Multi-Tiered Systems of Support (MTSS)
- In standard 1.9, “disability” should be included. As candidates examine their personal biases and seek to deepen their understanding of differences among students, disability should be considered among one of the characteristics that may engender bias.

### **Standard 2: Clinical Partnerships and Practice**

- Evidence of partnerships includes “tracking and sharing data such as hiring patterns of the school district/school or job placement rates...” At many institutions there is little to no capacity to follow candidates into their jobs – particularly when they teach out of state -- and whether that is the role of preparation programs is questionable.
- It is not clear if “clinical educators” means P-12 mentor teachers or higher education faculty who supervise clinical experiences for candidates. If the term means mentor teachers in P-12 schools, it should be noted that there is increasing reluctance of P-12 teachers to accept student teachers into their classrooms for many reasons. One of those reasons is the pressure teachers experience for ensuring that their students perform well on statewide student assessments. While preparation programs should be highly engaged with their P-12 partners and pursue robust partnerships which support strong mentorship experiences for their candidates, variables which impact on these partnerships should be considered.
- Clinical experiences should always include working with students with disabilities, no matter what the field of study for the teacher candidate.

### **Standard 3: Candidate Quality, Recruitment, and Selectivity**

- We are concerned about the use of GPAs and standardized test scores as criteria for entrance into programs in the face of evidence that suggests that these are not good predictors of teaching success. Standard 3.4 should focus on a candidates’ ability to be successful academically, but with a broader set of measures. We applaud the notion of a cohort average for candidate selectivity, however we hold deep concerns about the impact that these criteria may hold in terms of the diversity of the candidate pool. We need more minority candidates in teaching, not less.

- Some institutions have articulation agreements with community colleges whereby transfer students are guaranteed credit when transferring into a four year program. This could impact on selectivity criteria.
- We salute the attention to selectivity during preparation and at completion and believe that these are the key areas where selectivity should be focused, rather than at program entry.

#### **Standard 4: Program Impact**

- The capacity of higher education preparation programs to track their graduates and secure data related to employer satisfaction, completer satisfaction, value added measures and other P-12 impact measures is limited. A recent study (AACTE, 2013) indicates that only 8% of preparation programs in higher education have access to value added data for their graduates. Without capacity to secure this information, requiring it to be available is premature.
- Research on value added measures for determining a special education teacher's contribution to student growth and tracking this impact back to the preparation programs preparing special educators is extremely limited. The little research available related to special education and value added models demonstrates that when more than one educator works with a student – such as in a co-teaching or resource room situation, both of which are common for students with disabilities – it was impossible to distinguish which teacher impacted student growth. Moreover, the existing research on value added models does not address students with disabilities or the many educators and related service professionals who work with this student population. Value added measures should be considered with great caution and with very limited consequential value at this time.

#### **Standard 5: Provider Quality, Continuous Improvement, and Capacity**

- Student loan default rates are listed as part of a quality assurance system that a program must have. To our knowledge, there is no established relationship between default rates and program quality. Furthermore, default rates are reflective of many variables out of the control of a preparation program. While higher education institutions as a whole have such data, individual programs generally do not. This provision should be dropped.
- There is no standard that addresses the diversity of faculty. This should be added.

#### **Levels of Accreditation**

- A fourth level of accreditation has been added: a “gold” exemplary level. It is our belief that the purpose of accreditation is to set a bar for program quality and measure the extent to which every program meets that bar. Creating a gold level, which is “awarded to a small number of providers” adds a new purpose to accreditation – that of picking stars. We believe that all programs should be measured by one set of standards that represents program quality – and that all programs should be encouraged to meet that bar, rather than setting aside a “small number” of exclusive programs that meet another bar. We urge the elimination of the “gold” accreditation level.

- We are concerned with the potential over-reliance on value added by requiring additional weighting for standard 4, *Program Impact*. We see this playing out in the teacher evaluation system and this should be a caution, as research increasingly suggests that value added has limited validity in terms of measuring teacher effectiveness, especially in terms of teaching students with disabilities. Value added scores should carry limited consequential weight at this time.

**Additional Comment**

- The term “provider” is used throughout rather than educator preparation program. This implies a de-professionalization of educator preparation. We recommend the use of “educator preparation program.”

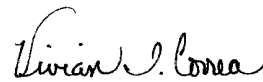
Thank you again for the opportunity to comment on the proposed CAEP standards. We would be pleased to engage with you further and provide any additional information that may be useful.



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