

April 29, 2016

Ms. Sophia: McArdle, Ph.D.  
U.S. Department of Education  
400 Maryland Ave, SW, Room 6W256  
Washington, DC 20202

**RE: Docket ID ED-2014-OPE-0057**

Dear Dr. McArdle:

On February 2, 2015, James G. Cibulka, Ph.D., then-President of the Council for the Accreditation of Education Preparation (CAEP), submitted comments on the initial Notice of Proposed Rulemaking (Docket ID ED-2014-OPE-0057) regarding requirements for the teacher preparation program accountability system under title II of the Higher Education Act (HEA), and the regulations governing the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program. CAEP's comments including a statement of strong support for the Department's goals of developing and distributing more meaningful data on teacher preparation program quality. CAEP is the single specialized accreditor of educator preparation in the United States. In that role, CAEP advances excellent educator preparation through evidence-based accreditation that assures quality and supports continuous improvement to strengthen P-12 student learning.

We have reviewed the supplemental NPRM published on April 1, 2016, and appreciate the opportunity to provide the U.S. Department of Education with additional comments, below, on the two issues identified in that notice.

1) Under what circumstances, for purposes of both reporting and determining the teacher preparation program's level of overall performance, a State should use procedures applicable to teacher education programs offered through distance education and when it should use procedures for teacher preparation programs provided at brick and mortar institutions.

Although distance education is defined in HEA regulations, this is an area of rapid change. In many instances, Educator Preparation Providers (EPPs) are utilizing (or moving toward) programs that are neither purely "brick and mortar" nor distance education. The proposed regulations fail to take this into consideration and would force a rigid determination that fails to acknowledge that more and more program completers have benefitted from hybrid programs. Such programs allow completers the flexibility of taking courses in both settings and even, in some instances, blended courses that combine face-to-face instruction and online instruction.

Furthermore, with the reauthorization of the HEA pending, the Department should delay creating new reporting obligations for States and Institutions of Higher Education until the outdated definition of distance education can be revisited and revised, as appropriate.

The concerns we raised in comments submitted with regard to the NPRM issued on December 3, 2014, included our belief that the cost of compliance is significantly understated. The proposed establishment of additional reporting requirements for distance education programs would entail additional costs and burden that are not justified.

2) For a single program, if one State uses procedures applicable to teacher preparation programs offered through distance education, and another State uses procedures for teacher preparation programs provided at brick and mortar, what are the implications, especially for TEACH Eligibility, and how should these inconsistencies be addressed?

The likelihood for inconsistency stretches far beyond the stated scenario of different States using distance education procedures and “brick and mortar” procedures for a single program. Making distance education programs subject to the State ratings systems on the basis of different criteria than is used for “brick and mortar” programs or national accreditation standards (e.g., graduates becoming certified in a state in a given Title II reporting year vs program completers in the state) ensures inconsistency. Given the variation in State ratings systems and CAEP’s standards used for national accreditation, it also would create a de facto U.S. Department of Education-sanctioned rating for distance education programs whereby any State’s rating of a distance education program could trump other State ratings or determinations for CAEP accreditation for the same program in a given year. Additional inconsistency is likely to follow from the fact that an EPP might only be subject to a State’s ratings system periodically (e.g., only when the number of graduates certified by the state surpasses the established threshold) and State personnel are less likely to have a complete understanding of the program compared to “brick and mortar” programs that are rated on a more regular basis.

By tying the requirement of State ratings of distance education programs to data from the Title II reporting year, for which a two-year lag time is common, the ratings, and the negative TEACH Grant consequences for students, could be expected to have impact long after a program might have already made significant improvement.

In conclusion, CAEP continues to support the Department’s goals for improving Title II reporting requirements and the overall quality of the teacher workforce. However, given the concerns we have outlined above, we respectfully ask that you give these issues further consideration. We thank you for the opportunity to provide further input and look forward to working with the Department to promote strong educator preparation programs.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christopher A. Koch".

Christopher A. Koch, Ed.D.  
President