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**Review of the CAEP Standards Draft**
**March 27, 2013**

The Association of Mathematics Teacher Educators is the largest professional organization devoted to the improvement of mathematics teacher education, with approximately 1000 members and 21 affiliates devoted to the preservice education and professional development of K-12 teachers of mathematics. The mission of AMTE is to promote the improvement of mathematics teacher education, K-*12.*The goals of AMTE are to promote: 1) effective mathematics teacher education programs and practices; 2) communication and collaboration among those involved in mathematics teacher education; 3) research and other scholarly endeavors related to mathematics teacher education; 4) professional growth of mathematics teacher educators; 5) effective policies and practices related to mathematics teacher education at all levels; and 6) equitable practices in mathematics teacher education, including increasing the diversity of mathematics teachers and teacher educators. Mathematics teacher educators include mathematics educators, mathematicians, general educators, teachers, educational psychologists, family members, and others who share this mission.

There are a number of positive elements in these draft standards, including the efforts to increase rigor in the accreditation process, the focus on continuous improvement and partnerships with schools and districts, and the attention to P-12 student learning. Moreover, below are specific comments from the standards that we deemed as particularly important:

- Page 7: "These new CAEP standards set the bar high so that attaining accreditation status will be a meaningful achievement."
- Page 7: "Commission recommends some evaluation data strategies that would be new to accreditation (e.g., recruitment plans, goals and monitoring of results)."
- Page 9: "would challenge the status quo and push for the urgent change needed in the field of educator preparation"
- Page 13 "The Commission also explored important functions of an accrediting body that are fashioned around attributes of high-performing education organizations. These are supported by research on effective management, and, especially, the Baldrige education award criteria, and also by recent trends and new approaches among accreditors."
- The standards recognize the importance of pedagogical knowledge and pedagogical content knowledge

At the same time, there are a number of elements that might be improved based on what we have learned from both P-12 and teacher education contexts. Thus, where appropriate we point out the need for the standards to be revised or recast. In addition, throughout the review we illuminate instances where the standards can be made clearer. For example, several standards need to be separated into two standards, and the statements need to be unpacked with bulleted points. We especially point out cases where we feel that compound statements de-emphasize important points and convolute the message. We also suggest adding more details in areas where we feel there is not enough information provided.

## Standard 1: Content and Pedagogical Knowledge

As mathematics teacher educators and mathematicians this standard is of particular importance to us. We think it is important for accreditation standards to acknowledge and build

on disciplinary recommendations. We are concerned that without an explicit link to disciplinary recommendations (where they exist), there will not be adequate recognition of or attention to the content and pedagogical content knowledge needed for teaching in that discipline. To this end, we suggest the inclusion of the following as a reference for developing teachers' content knowledge and pedagogical content knowledge:

> Conference Board of the Mathematical Sciences (2012).
> *The Mathematical Education of Teachers II*. Providence, RI and Washington DC: American Mathematical Society and Mathematical Association of America.

We contend that even though *The Mathematical Education of Teachers II* is specific to mathematics education, it provides a template for other content areas in terms of the types of knowledge that teachers need to have in order to effectively facilitate learning.

Currently, Standard 1.1 joins content knowledge with pedagogical content knowledge. These are separate but related forms of knowledge that are likely better considered separately. Separating the two types of knowledge will help to ensure that both of them are given careful and thorough consideration. We suggest that the standards should be written in such a way that teacher candidates in all content areas complete their programs with proficient content and pedagogical knowledge. Furthermore, consider the following statement on p. 13 of the document:

> "But it found that existing research provides some guidance: *content knowledge*, field experience, and the quality of teacher candidates 'are likely to have the strongest effects' on outcomes for students"

We recommend changing "*content knowledge*" to "*content and pedagogical knowledge*" or "*content and pedagogical content knowledge*" The rationale for this suggestion follows. The authors of *Teacher Preparation and Student Achievement: Reviewing the Evidence* (Grissom & Vandas, 2010) state: A review of existing quantitative research linking teacher preparation program characteristics to student achievement suggests the following conclusions, several of which are preliminary given the developing state of this body of work:

- Subject matter content preparation for teachers is important in more technical subjects such as math and science. However, there is little evidence that content preparation is linked to student achievement in other subjects.
- The impacts of math and science content coursework are not universal. Research suggests that the majority of benefits are obtained from a relatively small number of content course requirements—perhaps five—with benefits levelling off for additional courses. These courses are more effective when linked explicitly to teaching practice (i.e. math *education* courses appear to be more important than math courses). Also, the impact of content coursework is larger for some students (e.g., Advanced Placement) than others (e.g., remedial).
- Coursework and preparation in pedagogy is positively linked to student achievement. Such preparation appears to be more effective when (a) tied to content knowledge and (b) linked to opportunities for practice. However, little work exists to suggest precisely what pedagogical skills and practices preparation programs should teach.

Following are other general recommendations related to **Standard 1:**

- Page 17: "Research indicates that students learn more when their teachers have a strong foundation of content knowledge." Citation refers to "content knowledge for teaching",

so document should either delete Hill et al. citation or change the statement to pedagogical content knowledge.

- State Licensure Exams—recognize that cut scores affect different demographic groups differently—e.g., ELL, First generation college students, some racial/ethnic groups.
    - Are these exams a good indicator of subgroups' abilities?
    - We want to encourage broader diversity in education, and we agree that CAEP should work with AFT, NEA, AACTE, etc. on this issue.

***Standard 1.4:***

Candidates engage students in reasoning and collaborative problem solving related to authentic local, state, national, and global issues, incorporating new technologies and instructional tools appropriate to such tasks. This is a compound standard that addresses multiple issues and require substantial unpacking. For example, it encompasses:

(a) reasoning
(b) collaboration
(c) attention to issues outside of the classroom
(d) new technologies

This makes the standard difficult to interpret, meaning that some parts may not get the attention they deserve. For example, the final clause in 1.4 is the only mention of technology in Standard 1. If all the other parts are somehow addressed, maybe this could be overlooked. We recommend that technological pedagogical content knowledge (TPACK) be treated as a separate standard and that there should be some explicit discussion of the integration of technology in instruction. See references below:

Dilworth, P., Donaldson, A., George, M., Knezek, D., Searson, M., Starkweather, K., Strutchens, M., Tillotson, J., & Robinson, S. (2012). A framework for teachers for instructional innovation in the preparation of tomorrow's teachers. *Journal of Digital Learning in Teacher Education*, *28* (4), 130 -132.

Dilworth, P., Donaldson, A., George, M., Knezek, D., Searson, M., Starkweather, K.,Strutchens, M., Tillotson, J., & Robinson, S. (2012). Editorial: Preparing teachers for tomorrow's technologies. *Contemporary Issues in Technology & Teacher Education, 12* (1), 1-5.

Mishra, P., & Koehler, M. J. (2006). Technological Pedagogical Content Knowledge: A new framework for teacher knowledge. *Teachers College Record*, 108(6), 1017–1054.

***Standards 1.7 & 1.8:***

- Attention to working with families is important, but including it in 1.7 seems to dilute the attention. It is more realistic to state the objective in a way that communicates that candidates are engaged and learning to build these classroom cultures, relationships with families, and equitable practices by the end of their program.

***Standard 1.9:***

Both the standards and the examples of evidence related to the equity standard could be improved. For instance, it seems that the equity standard (1.9) is framed more in terms of differences, rather than resources. Furthermore, examples of evidence for equity seem much more candidate and input-focused and less outcome-focused than the examples of evidence for other standards. Other comments are listed below:

- While there are several standards within each of the subareas within the first standard, the Equity standard (#1.9) seems inadequate. There is only implicit recognition of culturally responsive instructional strategies. Further, the standard does not speak to students who struggle to learn or who have a learning disability.
- The way that 1.9 is stated is often read that the pre-service teacher is expected to be further along by the end of internship than what is realistic. The understanding of equity is a personal journey and a process. What we need to be sure is that candidates and education programs are looking for evidence that reflection is part of their ongoing process of lifelong learning. The main idea is that this is the start of their reflective practice.

Below are references that support the kind of knowledge that teachers need related to equity:


Banks, C. A. & Banks, J. A. (1995). Equity pedagogy: An essential component of multicultural education. *Theory into Practice, 34(3)*, 152 – 158.

Bartlett, L., & Brayboy, B. M. J. (2005). Race and Schooling: Theories and ethnographies. *The Urban Review*, *37*(5), 361 - 374.

Diversity in Mathematics Education Center for Learning and Teaching (DIME). (2007). Culture, race, power, and mathematics education. In F. Lester (Ed.), *Second handbook of research on mathematics teaching and learning* (Vol. 1, pp. 405-433). Reston, VA: National Council of Teachers of Mathematics.

Ford, D. Y. (2005). Welcome all students to room 202: Creating culturally responsive classrooms. *Gifted Child Today,* 28 (4), 28-30, 65.

Gutiérrez, R. (2009). Embracing the inherent tensions in teaching mathematics. *Democracy and Education*, *18(3),* 9-16.

U.S. Department of Education. (2013). *For each and every child –A strategy for education, equioty, and excellence.* Washington, D.C.

Weissglass, J. (2002). Inequity in mathematics education: Questions for educators. *The Mathematics Educator, 12*(2), 34-39.


## Evidence for Standard 1

***Standard 1.1:***

- There are several issues related to the examples of evidence for the first standard:
    - It is not clear how a common cut score across states can be implemented without a common examination for licensing teachers.
    - There is no indication of what "valid, reliable assessments" for instructional practices are available. Examples of these measures should be provided.
    - Grade point average (GPA) and/or grades in relevant coursework. This could be an overall GPA, GPA in the major, or GPA in supporting/integral content coursework related to the area of teaching (e.g., science coursework for early childhood educators)." One reviewer mentioned that her institution caps the teacher preparation programs. Therefore, the GPA requirements for entrance are high. However, there are issues with using GPA as an indicator. The change to a 3.0 content GPA will have a significant impact on the providers who have high standards. For example, one of the aforementioned reviewer's institutions exceeds all of the providers in the state on every measure, except GPA. This change will reward institutions with grade inflation and shut down programs where 2.9 in physics would be an excellent GPA. For example, this requirement would have eliminated 37% of their math and science

education graduates during the past four years. It also would have eliminated 11% of their minority candidates. (They only graduate 6% minority students so this will be a significant cut.) One could argue that eliminating 37% of the math and science teachers is a good thing, as they do not meet the 3.0 standard. However, the reviewer outlined 6 other perspectives about this issue for your consideration:

a) There is variability in GPA across and within institutions. Raising the GPA requirement would work if GPA for mathematics and science courses were consistent across institutions or across instructors or programs at the same institution. However, this is not the case. Therefore, such a policy actually rewards preservice teachers who attend institutions who have grade inflation and punishes preservice teachers who attend institutions that hold students to higher grading standards (e.g., an institution with a mean math GPA of 3.5 would have few students who would not meet such a requirement).
b) The proposed policy would escalate the teacher shortage in critical content areas. Reducing the pool of well-prepared beginning mathematics and science teachers by the magnitude described above at a time when we really need to increase the numbers of teachers is a significant problem.
c) There is an insufficient research base to support the change. Will raising the content GPA requirement lead to better teachers in the field? Will teachers with a GPA of 3.0 or better remain in teaching longer than teachers with a GPA of 2.75?
d) We need a valid and reliable metric across institutions. Should we raise the cut-score on the Praxis II exam?
e) The reduction in the teaching workforce will have implications on the hiring practices of schools. Given the shortage of certified mathematics teachers, many schools have relied on getting temporary or conditional certification to allow people to teach out of their disciplines. Would we rather have a Social Studies teacher with a GPA of 3.0 teaching mathematics on a temporary certificate or a mathematics major with a 2.75 GPA teaching mathematics?
f) GPA does not necessarily indicate that a teacher is prepared to teach that content. For example, a preservice teacher with a content GPA of 2.9 may actually be a better teacher than a preservice teacher with a content GPA of 4.0.

- One reviewer stated that his institution supports 3.0 GPA in general, but recognizes that GPA is not a single or clear indicator. The variation across and within institutions means that GPA is at most one source of information in a more complex puzzle of determining candidate quality, maintaining high standards, and encouraging students to consider the profession of teaching.

***Standard 1.2:***

- P-12 student surveys are not allowed in many school districts, especially larger school districts (informal feedback, notes, etc. are usually fine, but formal student surveys using common instruments, etc. are often not allowed).
- Even with informal feedback, rather than surveys, there is much to be learned from P-12 feedback to intern teachers. However, as with any student evaluation, we must be careful to

take the information in context and not place an over-emphasis on student surveys (feedback).

- P-12 student learning
    - Determining the impact of graduates of any educator preparation program on K-12 student performance is complex and challenging and will require a strong team with necessary resources to generate solutions. Many scholars and practitioners around the country are engaged in efforts to determine measures of teaching effectiveness and identify ways to measure the teacher-student link. Current problems that need solutions:

        a) State assessments are limited to a small number of content areas: Driven by federal accountability requirements, state assessment programs are generally focused on communication arts and mathematics. Even with this in mind, data for these content areas are unavailable for primary grades and grades 9 and 12. Programs such as agriculture education, family and consumer science, art, and music, among others are not assessed at the state level.
        b) The content area assessments administered to school children do not always provide data that may be directly linked to specific state certification programs. Preparation in secondary mathematics education requires far more than algebra and the End of Course biology assessment will not correspond with many of the science preparation programs.
        c) How do we identify the "responsible teacher" for a specific student? "But in a world of student mobility, teacher re-assignments, co-teaching, and multiple service providers, determining the roster of students to attribute to a teacher is more complicated than it may sound." (Liana Heitin Education Week, September 2011)
        d) What is an appropriate way to demonstrate student growth and to control for factors beyond that teacher's scope/responsibility (SES, parental involvement, truancy, etc.)?
        e) Singling out just a few areas of certification undermines any effort to unify and "standardize" assessment efforts in educator preparation programs.
        f) Graduates from preparation programs do not always enter the teaching profession. What percent of the graduates is the threshold for valid and reliable measures of the influence of the preparation programs? What is the minimum number of cases? How many years do we include as we look at teacher data?
        g) Beyond assessments, we also need infrastructure that will accurately link teachers with their students. For example, Louisiana is using a roster-verification system (completed by teachers and principals) to help ensure that the teacher-student links are accurate. However, critics of these systems argue that roster verification will lead to lawsuits and others suggest that the number of minutes the student has with a specific teacher should be entered in the system.
        h) What are multiple measures that could be used to determine teaching effectiveness (e.g., classroom observations by qualified observers)? How do we monitor the accuracy of those observations?
        i) For what purposes should we use status data? Growth/value-added data?

j) How will this data inform the design and enhancement of teacher preparation programs?

***Standard 1.9:***

- "h. Provider criteria that qualify candidates for completion, with program performance indicating that all completers have opportunities to reflect on their personal biases, access appropriate resources to deepen their understanding, can use this information and related experiences to build stronger relationships with P-12 learners, and can adapt their practices to meet the needs of each learner." *This statement is under the examples of evidence section. What measures are you suggesting for equity?*

**Standard 2: Clinical Partnerships and Practice**

In the description of clinical experiences, there is no mention of informal educational contexts such as science museums that may serve as important contexts in which prospective teachers can learn important skills.

***Standard 2.1:***

- "Page 19, Partners co-select, prepare, evaluate, support and retain high-quality clinical educators who demonstrate a positive impact on candidates' development and P-12 student learning. In collaboration with their partners, providers use multiple indicators and appropriate technology based applications to establish, maintain and refine criteria for selection, professional development, performance evaluation, continuous improvement and retention of clinical educators in all clinical placement settings."
  *The document defined candidates and completers. It should define partners. The authors of the standards should consider the capacity of school partners, especially in rural and urban settings. Many districts are beginning to ban student teachers. If the demands are too great, districts won't play.*

- The strong emphasis on partnerships is important, but the tone is somewhat off.
  - First, there is not enough focus on the need for partnerships across all facets of the program – including disciplinary faculty and other players within the program itself. Are we all on the same page? Do we have a common vision? (See comment relative to defining "program mission.")
  - Second, the partnership with schools seems to be very limited. There should be more of a mutual relationship expressed – including working with clinical educators and working with candidates beyond graduation. (Additional notes are included below.) The schools need to have a stake in the enterprise beyond just providing clinical placements.

- While mentioned at the end of Standard 2.1, there should be more emphasis on the connections of Standard 2 with Standard 1. Clinical experiences need to be tightly aligned with the content and pedagogical training that the candidates receive. The implication almost seems to be that candidates are "demonstrating" their knowledge, not that this is an important part of their development of content and pedagogical knowledge intertwined with their coursework. This seems to be an artificial disconnect.

***Standard 2.2:***

- The emphasis of 2.2 seems to be more about developing criteria and monitoring clinical educators than about supporting, developing, and working with the clinical educators. Shouldn't that be a part of the partnership?
- We don't understand the heavy emphasis on "technology-based collaborations" and "technology-based applications" throughout these standards – this use of technology appears to be a means to an end and does not need to be a part of the standard. Our interpretation is that this is a management/delivery system for the clinical experience, and not a part of the instruction that candidates provide. We really think this could be left for the examples. Other important issues are relegated to the examples that arguably should be in the standard (e.g., equity as mentioned below) – why is technology use elevated so highly?
- Second paragraph on p. 20 – how will working in a community center advance their understanding of how to work with students? Schools are listed as just one of many options, but aren't schools the primary context in which the vast majority will work? The attention to using technology for these experiences is fine, but does it provide meaningful "clinical" experiences? What is a "clinical" experience? Perhaps a definition is needed here.
- Moreover, there is no attention to the contexts for the clinical experiences needed to support students' development of attitudes and practices related to equity and diversity. This shows up somewhat in the examples, but not in the standard itself. We find it difficult to understand this omission.

**Evidence for Standard 2**

Standard 2.1:

- B. What is intended or meant by evidence of tracking and sharing data? In most partnerships with IHE, the school systems let us know what their needs are, and we respond (e.g., we have received in recent years expressed need for ELL and AIG, so we have tracked data and responded by implementing programs to meet those hiring needs)
- C. This objective is problematic in its wording—it is not very practical.

Standard 2.2:

- D. Somewhat vague and over-reaching

Standard 2.3:

- I. Ensuring or working to ensure diverse field experiences is a reasonable objective and data reflecting that effort is reasonable evidence. Smaller schools are not able, by numbers and by person-power, to always conduct meaningful studies on the effectiveness.

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

- The admissions requirements suggest high school course taking. This example of evidence presupposes that the teacher preparation program is at the undergraduate level. Examples for graduate programs should be provided.
- There is a lot about recruitment and admission standards in 3.1 to 3.4. Then 3.5 and 3.6 seem to be about weeding out students. Where is emphasis on providing support throughout the process? Formative assessment of candidate progress should include attention to what experiences or support may be needed to help candidates be successful.
- 3.1 through 3.3 seem repetitive. Could this be one statement?

- 3.1, 3.2, and 3.3: A general concern expressed is that the standard does not seem to recognize that there cannot be one template for recruitment to teacher education. Smaller colleges, in particular, often can frame a program and recruit for students who fit a particular profile. In particular, UG test cut-offs are set by the state, but for graduate licensure programs (MAT), the GRE is one of many factors—GPA, life experience, educational experience, drive and passion for learning, etc. For example, one institution may recognize that they have a selection bias for those individuals who want and are looking for a more personal approach to an MAT program. These ideas are addressed in 3.5.

***Standard 3.1:***

- "To accomplish their mission" – this is not clear. Whose mission? There is no previous statement about the need for a program to have a defined mission. Maybe there should be!

***Standard 3.2:***

- Please use "diversity of the United States' P-12 students…" rather than "diversity of America's P-12 students…" (which America? North, Central, South, etc…)

***Standard 3.4:***

There is a significant push in these draft standards to increase teacher quality by raising standards for admission into educator preparation programs. Higher admission standards, while intuitively appealing, are not clearly the answer, particularly when it comes to increasing diversity in the teaching force. Putting too much emphasis on standards for entry into these programs instead of focusing on more rigorous and effective strategies for supporting the development of content and pedagogical knowledge once candidates have been admitted into their programs may be problematic in terms of both the quality and diversity of the teaching force. Raising admissions standards might seem to be the "easy" strategy for addressing issues of teacher quality, but this strategy assumes an as yet underspecified link between scores or grades on content courses (i.e., the courses that candidates are likely to have taken before admission to teacher preparation that are typically not directed towards the particular knowledge needed for teaching) and ultimate teaching quality. A more productive focus might be on the exit requirements for candidates. Focusing at this point in the teacher development process would also allow for a stronger focus on the quality of *teaching*, as opposed to the quality of teachers.

***Standard 3.5:***

- What attributes? Should there be more specificity in terms of what these might entail? For example, dispositions seem to be unaddressed throughout this standard.
- Also, this standard assumes that the program's responsibility for its candidates expires as they leave the program. While Standard 4 looks at tracking them to assess program quality, we think the partnership with schools should extend beyond the end of the program.

**Standard 4: Program Impact**

- Standard 4 indicates that the teacher education program would document that the candidate has impact on P-12 student outcomes. It is not clear whether this impact is demonstrated prior to program completion or several years beyond the program.
- Page 26. At completion. Provider criteria that qualify candidates for completion, with program performance documenting that all completers can teach effectively with positive impact on P-12 student learning. *Upon completion of a program, we will not have standardized test data available. For example, they graduate in May and state data is*

*available the following fall. What are the expectations about which data would be collected for completers and when it would be reported? While they student teach or in their first few years of teaching? Your expectations are not clear.*

- Completely missing from this discussion
    - Is the program addressing the needs of the community it is serving? (cf. the major emphasis on this in 3.3)
    - What efforts are being made relative to placement in high-needs schools? This seems to be a critical national problem, given data about the relationship of teacher quality to school demographics.
- This standard is important and a good step forward. However, many of the measures seem problematic, especially for 4.1 and 4.2. "Value-added" measures are particularly difficult, given that candidates may end up in very different teaching contexts that are not comparable. If a candidate is in a school whose administration does not support best practices, they may have difficulty meeting these requirements. So do we steer our students to top-performing schools that will be more supportive?

***Standard 4.1:***

We are very concerned about Standard 4.1—Impact on P-12 student learning. This standard seems both impractical and non-informative. These are not good measures of program quality or of teacher quality. It falsely assumes a one-to-one-to-one cause and effect relationship. There are too many confounding factors that make this a spurious connection. Below are additional arguments against this standard.

- Most important, perhaps, is that before we connect the accreditation of teacher education programs to P-12 student test scores, we need both a logical argument and a statistical model for connecting programs to their graduates to those graduates' students' P-12 test scores. The argument and the model must not disadvantage programs that encourage their graduates to work in struggling schools and districts (i.e., those in which the standards of knowledge and practice enumerated in this document are not uniformly observed), to enact innovative pedagogies, particularly those designed to support the learning of historically disadvantaged groups of students, and to advocate for students, teachers, schools, and communities. Capacity is not primarily an individual characteristic, but is instead a characteristic of a system. Measures of impact that fail to account for the systemic aspects of capacity are likely to widen, rather than narrow, inequities across schools and districts.
- At the same time, it is important to advocate for the development of measures of "impact" that include, but go beyond, P-12 test scores – and this development must occur *before* the accreditation standards are put into place so that the additional measures are fully integrated into the accreditation system. It is critical to address how the new accreditation standards will account for impact that is seen in other measures of P-12 student learning, in retention of new teachers in the profession, in teachers' development of and contribution to professional learning communities, and in teacher leadership and advocacy for children, teachers, schools, and communities? Relying on existing content-neutral and resource-intensive observation frameworks (e.g., Danielson) is not sufficient.
- Assessing the impact of educator preparation programs solely in terms of P-12 student test scores will be overly narrow and potentially counter-productive. Further, educator preparation programs, particularly those based in colleges and universities, have historically played an important role in preparing new teachers for educational systems,

as they currently exist while simultaneously advocating for change in those systems. Any set of standards related to "impact" should account for these dual functions.

- The provider documents, using value-added measures where available, other state-supported P-12 impact measures, and any other measures constructed by the provider, that program completers contribute to an expected level of P-12 student growth. *Very few states have reliable value-added measures for the different certification areas. Schools will not provide this data. This will require infrastructure at the state level. This is problematic.*

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

- Page 28 The provider's quality assurance system is comprised of multiple measures that can monitor candidate progress, completer achievements and the provider's operational effectiveness. These include measures of program outcomes for:
    - Completer or graduation rates;
    - Ability of completers to meet licensing (certification) and any additional state accreditation requirements;
    - Ability of completers to be hired in education positions for which they are prepared; and
    - Student loan default rates. *How would providers get data on student loan default rates?*
- Page 28, "The provider assures continuing quality of curricula; educators (faculty); facilities, equipment, and supplies; fiscal and administrative capacity; student support services; recruiting and admissions practices; academic calendars, catalogs, publications, grading policies, and advertising; measures of program length and objectives; and student complaints." *There is a problem with this list. Provider assures continuing quality of: What is meant by continuing quality of student complaints?*

Standard 5.3:

- Student loan default rates? Is this the responsibility of the program to monitor? This seems like an onerous requirement.

**Recommendation on Annual Reporting and CAEP Monitoring**

- Graduation rates: How will graduation rates be calculated? In our program students enter the university indicating an education major. About 90 students/year do not make GPA requirements and are required to transfer to other colleges or universities. Approximately 450 students apply for our programs at the end of sophomore year and about 350 students are accepted. Some students are not successful during the student teaching experience (6 this past year). Which students will be included in generating graduation rates? *Why? To what end? How is the data compiled? Validated? Shared? This could be very problematic…*

**Recommendation on Levels of Accreditation**

- Why introduce a new "level" of accreditation? There are automatically three levels—not accredited, probation, and accredited. Why create a fourth "exemplary"? It is always possible to highlight good examples of outstanding program quality, and some programs may excel in one area more than other areas. What will creating a small number of "gold" providers do that current program ratings do not? Good programs will of course, strive to be

"gold" and how do evaluators decide what meets the "gold" standard? This seems both unnecessary and not helpful to the wide diversity of programs that exist across our country that excel in one area or another, but may not make the "gold standard" accreditation. In addition, does the document need more explicit language about alternative routes to certification?

- The requirements to gather and report data seem quite burdensome and potentially expensive. Is this expensive gathering of data really worth the effort? Will some programs that are currently accredited no longer be accredited in this new system? Is this likely to be programs that are generally not held in high regard by professionals in the field? Is there reason to believe that by seeking to comply with the accreditation standards, programs will improve their quality? Or will the efforts actually go to demonstrating compliance? Thus, meeting quality standards does not necessarily mean that program improvement will occurred. This seems paradoxical, but it is basically the analogue of the phenomenon of improving students' test scores without improving their understanding.

**Overall Statements about Evidence**

The document might include a statement indicating that the examples of evidence are not comprehensive. In terms of the individual standards, much of the concern comes from "Examples of Evidence." Are these examples the "requirements" or are they truly examples of types of evidence? Many colleagues assume that the examples that are listed will serve as required sources to demonstrate meeting the Standard. Below is a summary of concerns about the examples of evidence from a smaller college's perspective:

- In some places, some of the "examples of evidence" point to a burden on smaller schools—there are fewer people, fewer resources, higher teaching loads, and often a more hands-on involvement in multiple roles—teaching, supervision, assessment, program assessment, etc. not to mention research, scholarship, and participation in the profession.
- Throughout, many colleagues react more to the "Examples of Evidence" as "required data or mechanism of reporting to demonstrate proficiency." I think that the authors should consider both the placement of the "examples" as well as clarifying the nature of the "examples" versus what is "required" reporting. Most schools that have strong programs will want to demonstrate that and will tend to report everything that is listed in this section. See first bullet on practicality for smaller programs.
- There is a strong reaction to the use of P-12 student performance data to measure either individual candidate quality or program quality. This is a false assumption of causation and the case for association is muddy at best, with many confounding factors that are out of the control of either the teacher candidate or the education program of the IHE.
- In some cases, the examples and standards speak to the use of "rubrics or assessment tools that are both valid and reliable." Validity is easier to establish than reliability of some instruments. Although the Standards' Examples of Evidence on page 30 cite various ways for an institution to establish validity and reliability, smaller schools may perceive that they cannot use in-house developed instruments unless they are able to perform full-scale validity and reliability studies. See the first bullet on practicality.

**Typos**

Page 10 The current policy context for education makes this moment as a pivotal one [delete as]

Page 16: their own, progress and growth. [delete comma]

Last line page 31
user-friendly, transparent, forms. [Delete comma after transparent]

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