



January , 2015

Ms. Sophia McArdle  
U.S. Department of Education  
1990 K Street, NW, Room 8017  
Washington, DC 20006

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

Dear Ms. McArdle:

On behalf of the Association for Career and Technical Education (ACTE), representing America's teachers, administrators and counselors in the field of career and technical education (CTE), and the National Association of State Directors of Career Technical Education Consortium (NASDCTEc), representing the state and territory leaders of our nation's CTE system, we write to provide comments on the proposed teacher preparation rule. We appreciate the department's goal of promoting effective practices for preparing, recruiting and nurturing great teachers, and we appreciate the department's consideration of these recommendations in finalizing this rule.

The proposed rule would require states to report on the quality of both traditional teacher preparation programs as well as alternative routes to state certification or licensure programs, and to link Teacher Education Assistance for College and Higher Education (TEACH) Grant program eligibility to the determinations of quality made and reported by states. A hallmark of strong CTE programs is an educator with industry experience, knowledge of industry standards and the ability to apply those in a classroom setting. Unfortunately, all too often teacher preparation programs focus primarily on teachers of core academic subjects. We have urged Congress to promote the development and implementation of CTE teacher preparation initiatives and alternative routes to CTE teacher certification by states through the reauthorization of the Elementary and Secondary Education Act (ESEA), and to provide greater support to institutions that offer traditional and alternative CTE teacher certification programs through the reauthorization of the Higher Education Act (HEA).

With increased pressures for school districts to focus on career readiness, a shortage of qualified educators has hampered the ability of states and LEAs to implement new

programs based on the needs of the regional economy. Federal policies should empower local districts to hire qualified professionals and provide states with opportunities to create alternative pathways to licensure for mid-career professionals with industry experience in related fields, and then to support those teachers through additional professional development. HEA teacher preparation programs, including TEACH grants, should incentivize postsecondary institutions to develop alternative route programs that allow aspiring CTE educators to undergo rigorous pedagogical training for licensure, not create new barriers to such programs thought burdensome federal requirements on the institutions. In preparing this final rule, we hope the department will recognize the importance of alternative certification programs in preparing mid-career professionals with extensive experience in economically in-demand industries who may be able to fill teacher shortage positions in high-need CTE classrooms. To this end, it is critical that the final rule not create undue burden on teacher preparation programs. Every effort should be made to streamline requirements to ensure both efficiency and effectiveness.

The proposed rule seeks to establish required indicators that states must use to report on teacher preparation program performance, with the specified objective of making those indicators more focused on program outcomes. Among the suggested indicators, the department proposes to use “student learning outcomes,” which may take into account the change in student achievement in tested and non-tested grades and subjects. In determining student achievement for tested grades and subjects, the rule proposes to utilize assessments that are currently required under section 1111(b)(3) of the ESEA. Under the definition of student achievement in non-tested grades and subjects, the draft regulation proposes:

“measures of student learning and performance, such as student results on pre-tests and end-of-course tests; objective performance-based assessments; student learning objectives; student performance on English language proficiency assessments; and other measures of student achievement that are rigorous, comparable across schools, and consistent with state guidelines.”

While CTE programs are rigorous and often aligned with core academic curriculum, most CTE programs are not subject to state assessments under section 1111(b)(3) of the ESEA, and would fall within the category of non-tested subjects for the purpose of assessing student achievement under this indicator.

Though the draft rule suggests a number of possible measures of student achievement for non-tested grades and subjects, there are established indicators of CTE student performance already prescribed in federal law. Section 113(b)(2)(A)(ii) of the Carl D.

Perkins Career and Technical Education Act requires states to measure “student attainment of career and technical skill proficiencies, including student achievement on technical assessments, that are aligned with industry-recognized standards, if available and appropriate.” This indicator is already measured by states and is “rigorous, comparable across schools and consistent with state guidelines,” as suggested in the proposed rule. It also more directly examines learning outcomes among students in CTE classrooms. The department should encourage states to incorporate this measure, where appropriate, in assessing and reporting on the performance of teacher preparation programs. In addition, this indicator, and the others proposed, must be carefully considered to ensure that their use is valid and reliable for the intended purpose. There are many scenarios within CTE programs where other teacher contributions might be more appropriate measures of success, including efforts around partnerships, student engagement, career pathway progress and other program outcomes.

We hope that the department will develop a final rule that supports greater program quality, while recognizing the need to create policies that encourage individuals to pursue a career as a CTE educator. Please feel free to contact Mitch Coppes (mcoppes@acteonline.org), ACTE’s Legislative and Regulatory Affairs Manager, or Steve Voytek (svoytek@careertech.org), NASDCTEc’s Government Relations Manager, should you have any questions about our comments or positions.

Sincerely,



Stephen DeWitt  
Deputy Executive Director  
ACTE



Kimberly A. Green  
Executive Director  
NASDCTEc