October 23, 2019

Chairman Bobby Scott  
Committee on Education  
and the Workforce  
U.S. House of Representatives  
Washington, D.C. 20515

Ranking Member Virginia Foxx  
Committee on Education  
and the Workforce  
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Dear Chair Scott and Ranking Member Foxx:

The Teacher Education Division (TED) of the Council for Exceptional Children (CEC) represents special education faculty in higher education. TED is one of 17 divisions comprised of CEC members who are dedicated to the preparation and development of future special educators. Over 2000 strong, TED members lead and support teacher education on behalf of students with exceptional needs and their families.

**The Higher Education Act and the Teacher Shortage**

TED has become increasingly alarmed about the shortage of teachers, particularly special education teachers, in recent years. One of the all too common responses to the shortage in states has been to lower the standards for entry into the profession. We know that lowering the bar for teachers will not bring us the student outcomes needed in PK-12 for students with disabilities to move successfully into higher education and eventually into the workforce.

Michigan is illustrative of the current status of the teacher shortage. A recent report indicates a dramatic increase in the utilization of long-term substitute teachers – who are not required to have a college degree or any teacher training and may serve for as long as a year. One school district – Benton Harbor Public Schools – reported that last year 42% of their teachers were long term substitutes. Of all the teacher vacancies in Michigan, 41% are in special education. And the future does not look bright, as enrollment in teacher preparation programs in Michigan universities has dropped 66% in the last 7 years (French, 2019). It is not surprising that Michigan students rank in the bottom third of the nation.

Teachers need strong preparation in order to learn evidence-based strategies, such as how to provide multi-tiered systems of support, positive behavioral interventions and supports and universal design for learning. These are not skills that are learned on the fly. TED wants to draw a straight line between student outcomes and teacher preparation.
A recently released report concluded: “Evidence shows that underprepared, out-of-field, and substitute teachers typically depress student achievement and have higher attrition rates...Research has found that special education training significantly improves teachers’ capacity to effectively teach students with special needs” (Learning Policy Institute, 2017).

In addition to the shortage of special education teachers, the field is experiencing a shortage of faculty in special education. This reduces the capacity of the field to address the teacher shortage and shrinks the critical infrastructure in higher education which is essential to ensuring a robust set of special educators, including teachers, leaders, researchers and higher education faculty. Without a well-prepared workforce in special education, the promise of IDEA will be elusive.

We are compelled by the following facts:

- Special education is the field with the greatest teacher shortage with 48 states and DC reporting shortages.
- Those prepared through alternate pathways with less coursework and student teaching are 25% more likely to leave their schools and the profession than those who are well prepared.
- Teacher preparation program enrollment is down 35% in the last 5 years (Learning Policy Institute, 2017).
- Since 2009, there has been a 19% reduction in special education doctoral programs in the U. S. Between 2016 and 2018, eight special education doctoral programs closed. As of 2018, there were fewer special education doctoral programs than there were in 1987. Between 2012 and 2017, there was a 17% reduction in special education doctoral student graduates, thus limiting the pool of available faculty, researchers and leaders (Smith, 2019).

In the context of this worrisme environment in the field of special education, we write to share our perspective on the newly introduced College Affordability Act, H.R. 4674. The bill, introduced by Chairman Scott, is a full-blown reauthorization of the Higher Education Act. We are pleased to see the process move forward in a comprehensive manner.

**TED is pleased to see the following provisions included in the bill:**

- A strong reauthorization of the Teacher Quality Partnership Grant (TQP) program under Title II clarifying that funds may be used for principal preparation and increasing the authorization level to $500 million. This program is targeted to high need field and high need schools and is much needed to increase the pipeline of special educators.
- Inclusion of much needed programs in Part B of Title II, particularly the Well-Rounded Teaching Grants and the Graduate Fellowships to Prepare Faculty in High-Need Areas at Colleges of Education. Both of these programs will be an important contribution to addressing the shortages noted above.
• Multiple provisions, particularly in Title VII, to expand access to higher education for students with disabilities.
• Continuation of the critically needed TEACH grants which are important incentives to attract and retain prospective teachers into teacher education programs in high need fields. These grants serve as essential incentives for prospective special education teachers to enroll in preparation programs and serve in the field.
• Retention and in some cases strengthening of three critical loan forgiveness programs utilized by teachers: The Public Service Loan Forgiveness Program, the Teacher Loan Forgiveness Program and the Loan Forgiveness for Service in Areas of National Need program. These loan forgiveness programs, when operated effectively, serve as important incentives for prospective teachers to enter the profession.

TED would like to work with you to modify the following provisions as the bill moves forward to markup and floor deliberation.

• The expanded data collection required for the Teacher Quality Partnership Grants

The bill expands data collection requirements. For TQP grants, the requirement to follow program graduates for five years after program completion extends beyond the life of the grant. What funding would be available to carry out this requirement?

o Data collection and accountability provisions in Title II for all teacher preparation programs

While the bill expands data collection for teacher preparation programs in the nation, it also expands data collection for all of higher education. These provisions appear to have redundancies. If all of higher education is required to report data related to student majors and outcomes, the need for additional data collection only for teacher education majors needs to be revisited.

It is also noteworthy that the last decade of data collection in Title II has yielded minimal if any utility for program improvement. The data collection is costly and burdensome and its utility is, at a minimum, questionable. A 2015 GAO report found that only 5 states found the Title II data very useful. In addition 48 states indicated that they are not using sections of Title II reports or that they already collect most of the useful Title II data through other mechanisms, thus suggesting that “states are frequently required to complete some reporting requirements that they report are not contributing to their oversight activities” (p. 26). In addition, GAO found that most of the preparation programs and K-12 school districts they interviewed questioned the usefulness of some Title II data to themselves and other stakeholders. The majority of preparation programs indicated that very little of the Title II data was useful in assessing program performance. Furthermore, there seems to be little indication that prospective teaching candidates use Title II data to inform decisions, nor that K-12 districts use the data when recruiting new teachers.
Teacher preparation programs could better utilize the resources they currently use in data collection to support the preparation of much needed new teachers. Accountability for teacher preparation resides with the state. The provisions in the bill which reinforce and further articulate the state role in accountability are useful and will be far more meaningful than additional onerous data collection.

- **Expanded data collection for TEACH grants and changes in student eligibility**

  TEACH grants are a small student financial aid program, totaling about a hundred million dollars per year. In comparison, the Pell Grant program is an annual $3 billion investment. Yet the data collection for the small TEACH grant program would exceed that which is required for the far more robust investment in the Pell Grant program. This is problematic. TEACH grants are unique in student financial aid in that universities choose whether or not to participate and grant recipients are required to work in the field for four out of 8 years after graduation in order to avoid the grant converting to a loan that must be repaid. Given these unique features of the program, which are unlike other student aid programs, universities are sometimes hesitant to participate. Yet these grants are desperately needed to incentivize students to choose to become teachers. Adding a new burden of data collection for this small program will serve as yet another disincentive for university participation. In an era when the teacher shortage is at crisis proportions, these grants should be made as appealing as possible.

  The bill changes the student eligibility for TEACH grants in two significant ways. First, it allows students who are in terminal AA degrees to become early childhood educators to access TEACH grants for completion of the AA degree. Second, it prohibits freshmen and sophomores in four-year teacher preparation programs from participating in TEACH grants. This seems to be contradictory. Many teacher preparation programs at four year institutions begin in the freshman year. Eliminating TEACH grant access for these students will provide a new obstacle for potential teachers in terms of accessing higher education. In addition, the new eligibility for a terminal AA degree is concerning in that the BA has long been considered the entry level degree for a fully prepared teacher. Opening the door to an AA terminal degree with the TEACH grants is problematic, as it could be perceived as an invitation to states to lower teacher standards in the face of the teacher shortage.

- **Inclusion of a separate authorization for a non-higher education alternate route program, Teach for America**

  Research is clear that fully prepared teachers are most effective and stay in the field longer than those who are minimally prepared. The expertise required to be a special education teacher is achieved through rigorous and comprehensive preparation including strong pre-service clinical preparation with expert feedback from accomplished educators.

Thank you for your leadership and your consideration of our views. Please let us know if we can provide additional information or assist you in any way.
Best regards,

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CC: Members of the Committee on Education and Labor