



United University Professions

To: John L. D'Agati, Deputy Commissioner
New York State Education Department, Office of Higher Education

From: Jamie Dangler *J.D.*
VP for Academics
United University Professions

Re: Comments on Teacher and Leader Preparation Program Profiles/Feedback Reports

Date: September 5, 2012

United University Professions represents faculty and professional staff in teacher and school leader preparation programs at SUNY's state operated campuses. I participated in the New York State Education Department's July Feedback Report informational webinar and its August 2nd meeting in Albany. UUP has carefully reviewed the Program Profile "Mock-Ups" and has solicited input on the proposed Feedback Reports from our members involved in teacher education programs on various SUNY campuses. We appreciate the opportunity to provide comments and suggestions for your consideration.

UUP supports fair and accurate evaluation of teacher education programs. To that end, we recommend a re-evaluation of SED's Program Profile/Feedback Report plans in order to eliminate specific measures that are not accurate assessments of teacher preparation programs and modify others to more accurately reflect program performance.

Problems with Proposed Measures

The proposed profiles rely on easily quantifiable data, some of which will be de-contextualized and, therefore, provide misleading information about New York State's teacher preparation programs. There are data points that embody incomplete or faulty definitions. One illustration of this problem is Teacher Employment Rates, which we were told will measure employment in teaching positions in New York State only. There are at least two problems with this measure:

First, many students in teacher education programs obtain employment in related fields. This is often the result of market conditions and limited employment options in teaching. It can also reflect specific choices made by students whose teaching certification is part of a broader career plan. For example, Adolescence Education programs are constructed as dual majors, with students obtaining majors in specific content areas such as History, Economics, Anthropology, and English as well as teaching certification for grades 7-12. Students with majors in History/Adolescence Education commonly end up doing museum/archival work and Anthropology/Adolescence Education majors may become employed in government or not-for-profit aid organizations. The proposed measure for Employment Rates in teaching positions would score the program/institution such students came from as "unsuccessful" in these cases.

Second, students who graduate from teacher education programs in New York State often obtain employment out of state. Some programs have a consistently high proportion of their graduates in this situation. One illustration provided at the August 2nd meeting was SUNY Plattsburgh's experience with students commonly seeking employment in the neighboring state of Vermont. Aside from unique factors that may create a pipeline from specific institutions to job markets outside of New York State, student employment prospects are impacted by economic and labor market conditions that programs and institutions cannot control. Measures that do not account for the full set of contextual factors are unsound assessment measures.

Use of Data Profiles

While one of SED's stated objectives is to design feedback reports that will provide useful information to teacher education programs and institutions, the "mock up" program profiles provide data points that will not accurately reflect program performance and hence will fall short of providing useful information. Furthermore, they will distort program performance, with potentially damaging consequences for the public standing of our programs and institutions.

Input received during the Feedback Report webinars and face-to-face meeting revealed that institutions are already collecting much of the data SED is proposing for Feedback Reports, while some of the proposed data were identified as new and potentially useful. Please consider a more systematic inventory of the data needs of teacher education programs and institutions before finalizing required Feedback Report content. One-size-fits all data requirements may not be the best approach if the objective is to provide useful information for our programs. In addition, collection of data that reflect unsound measures of program performance will unnecessarily overload program faculty and institution staff that are already overburdened by data collection which, in many cases, meets imposed mandates without reasonable justification based on professional standards and knowledge in the field. Engaging in unsound data collection will weaken, and perhaps undermine, the possibility for productive collaboration between SED and education programs in efforts to improve teacher education in New York State.

Race to the Top Requirements

We understand the role of "institutional performance profiles" in meeting Race to the Top funding criteria and recommend further analysis of the parameters for reaching compliance. Proposed measures that will provide incomplete and misleading information should be eliminated, with emphasis on provision of sound and defensible information. Continuing the dialogue with stakeholders that began this summer could yield a modified plan that will satisfy Race to the Top requirements and further a collaborative partnership among SED, labor unions, campus administrations, and the faculty and staff who are "in the trenches" and committed to maintaining and enhancing New York State's high quality teacher education programs.

Conclusion and Recommendations

I have chosen to provide a few specific examples to illustrate the general problems we see with the Program Profile/Feedback Report proposal. UUP urges SED to consider the many additional comments obtained through webinars, the August 2nd meeting, and comments submitted by teacher educators from around the state to address specific data points that are problematic by either eliminating them or revising them to include important contextual factors. We also recommend that you consider the well-documented problems inherent in high-stakes testing as an indicator of program performance and that stakeholders be engaged in further discussion with regard to public release of data profiles. While release of some information may be appropriate, release of information that is misleading or presented out of context is problematic.

We urge SED to recognize that "facts" are constructed. They are not unconditional and inherently true or accurate. They reflect the assumptions and definitions embodied in measurement

instruments. It is critical to recognize the role SED will play in the creation of “facts” about our programs and institutions that will not hold up under the scrutiny of serious methodological review. This will harm our programs, SED’s credibility with professionals in the field, and the potential for further productive collaboration to achieve the goals SED and our teacher education programs and institutions have set for teacher preparation in New York State.

Thank you again for giving us an opportunity to comment and for extending the comment deadline to September 7, 2012.