



August 21, 2014

The Honorable Tom Harkin
731 Hart Office Building
Washington, DC 20510

Dear Senator Harkin,

On behalf of the National Coalition on Personnel Shortages in Special Education and Related Services (NCPSSERS), representing over 30 national organizations committed to alleviating the persistent shortage of professionals available to address the needs of America's six million children and youth with disabilities, we are pleased to share feedback to key provisions within the draft Higher Education Affordability Act (HEAA).

A key tenant to promoting success for children and youth with disabilities is ensuring that all educators have the professional expertise to address diverse academic, social-emotional, and developmental needs. To that end, the HEAA provides a pivotal opportunity to rethink teacher preparation programs to focus on recruitment, retention and training of educators.

As you know, for the last 40 years, there has been—and continues to be—a national shortage of special educators. Consider these facts:

- According to the U.S. Department of Education, nearly every state reports a shortage of special educators¹;
- 51% of school districts across the nation report difficulty in hiring highly qualified special educators²;
- 83% of special educators and specialized instructional support personnel (SISP) report their schools do not have enough professionals employed to meet the needs of students with disabilities;
- Special educators have the lowest retention rate of professionals within a school and leave the teaching profession at nearly twice that of their general education colleagues (12% vs. 7%);
- The extremely high ratios of SISPs-to-students are often unmanageable and present extreme challenges in providing early identification and intervention services – such as school counseling, psychology, nursing, social work – to all students in need of this support;
- Special educators leave the profession due to myriad of factors, including ambiguous professional roles, professional isolation, and lack of administrative support.

Addressing the national shortage of special educators requires a comprehensive approach that focuses on enhancing pre-service preparation, innovative recruitment strategies, and improving working conditions once employed in a school. It is with this in mind, that NCPSSERS offers the following feedback on HEAA draft legislation:

¹ <http://www2.ed.gov/about/offices/list/oep/pol/tsa.doc>

² <http://ies.ed.gov/ncee/pubs/20114026/pdf/20114027.pdf>

Educator Quality Partnership Grants

NCPSSERS is pleased that Title II reauthorizes and strengthens the Teacher Quality Partnership Grants, expanding them to become the Educator Quality Partnership Grants with a focus on educator recruitment, principal preparation, clinical preparation, residency programs, and induction programs. These are all key elements to confronting the persistent, nationwide shortage of special educators.

However, NCPSSERS has two areas of concern that must be addressed to ensure that the accountability structure outlined in HEAA does not have unintended consequences on vitality of special education preparation programs: (1) emphasis on retention as a means for assessing a teacher preparation program; and (2) reliance on K-12 student outcomes to determine the effectiveness program graduates.

First, NCPSSERS believes it is essential to increase retention rates among special educators as part of confronting the national shortage. While NCPSSERS was pleased to see that retention has risen to a prominent level within HEAA, we strongly caution against using retention data in the high-stakes approach that has been drafted. Our concern stems from our knowledge about why special educators choose to leave their role. In a report by the Council for Exceptional Children, highly cited reasons include variables that take place within a school culture, such as ambiguous responsibilities and feelings of professional isolation. While these are certainly areas that can be addressed in federal policy, it is unreasonable to say that a teacher preparation program has control over these variables.

Second, NCPSSERS has significant concerns regarding new requirements for evaluating teacher preparation programs based on K-12 teacher evaluation systems that are currently in their infancy and, in some cases, have been implemented without considering the unique attributes of a special education teacher or a specialized instructional support personnel. Furthermore, many states have adopted new K-12 teacher evaluation systems that use Value Added Models (VAM) to determine teacher effectiveness. NCPSSERS has concerns regarding VAM and believes that extreme caution should be used when implementing VAM, until there is a general consensus among the research community that it is a valid and reliable way to determine effectiveness³. Currently, there is growing concern regarding validity and reliability of VAM, particularly as it relates to students who have more than one educator for a particular subject matter⁴.

Educator Preparation Program Reform Grants

NCPSSERS has significant concerns regarding the new Educator Program Reform grant program. While NCPSSERS supports the concept of strengthening educator preparation programs, such an effort must focus on expanding the pipeline of special educators and SISP's and building the capacity of institutions of higher education to support high-quality special education preparation programs.

As explained above, nearly every state has a shortage of special educators, continuing a decades-long trend. NCPSSERS views the Higher Education Affordability Act as a prime opportunity to rectify this shortage but is concerned that the following provisions may do more to exacerbate the shortage:

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http://www.cec.sped.org/~media/Files/Policy/CEC%20Professional%20Policies%20and%20Positions/Position_on_Special_Education_Teacher_Evaluation_Background.pdf

⁴ <https://www.ets.org/Media/Research/pdf/PICANG14.pdf>; http://www.carnegieknowledge network.org/wp-content/uploads/2014/01/CKN_McCaffrey_Disabilities_Fourth_formatted.pdf

- Establishes an accountability structure for teacher preparation programs that relies too heavily on K-12 teacher evaluation systems, which are still in their infancy and are not valid and reliable for special educators, in many cases.
- Establishes an accountability structure for teacher preparation program that does not acknowledge the many reasons educators leave the teaching profession, that are not due to the adequateness of their preparation. For example, the Council for Exceptional Children Presidential Commission on the Conditions of Special Education Teaching and Learning found that special educators are asked to fulfill roles that are fragmented, ambiguously defined, and obscured by conflicting responsibilities. Addressing these issues will better address the critical issue of special education teacher retention.
- Creates a high-stakes environment for teacher preparation programs based on flawed accountability measures, which may result in a disincentive for institutions of higher education to strengthen and invigorate its special education preparation program.

NCPSSERS appreciates HEAA's requirement that institutions of higher education receiving Federal assistance establish annual goals for increasing the number of prospective educators trained in shortages areas, including special education. While NCPSSERS hopes this focus will support special education preparation programs and increase the recruitment of special educators, our concerns regarding the rigid accountability structure outlined above, remain and must be addressed if we are to comprehensively tackle recruitment and retention of special educators.

Graduate Fellowships to Prepare Faculty in High Need Areas at Colleges of Education

NCPSSERS regrets that this important program was not included in the chairman's discussion draft. Extensive research documents the critical shortage of special education faculty – those who are developing the research base that supports the preparation of teachers and those who are preparing tomorrow's teachers. This shortage exacerbates the shortage of K-12 special education teachers and curtails the capacity of general education candidates to develop skills in instructing students with disabilities. We would like to work with you to find ways for the bill to address this critical need.

Thank you for your leadership on behalf of the over 6 million children and youth with disabilities and, their families and the educators who work on their behalf. We look forward to continuing to work with you to improve programs that prepare special educators and specialized instructional support personnel.

Sincerely,

Susan Karr, Co-Chair
American Speech-Language-Hearing
Association

Kim Hymes, Co-Chair
Council for Exceptional Children

Sasha Pudelski, Co-Chair
AASA: The School Superintendents
Association