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U.S. Department of Education
400 Maryland Avenue SW, Room 3C124
Washington, DC 20202

May 20, 2021

RE: Docket ID ED-2021-OESE-0045, Proposed Priorities--Effective Educator Development Division Programs

Thank you for the opportunity to provide comments on the proposed priorities for the following programs of the Effective Educator Development Division (EED): Teacher and School Leader Incentive Grants (TSL); Teacher Quality Partnerships (TQP); and Supporting Effective Educator Development (SEED). New America is an independent, non-profit policy and research organization, and its Education Policy Program works to strengthen and improve the educational system so that all individuals have equitable access to high-quality learning that prepares them for college, careers, and civic life. We bring intentional and sustained attention to the students, families and communities that are least well served by existing educational policies and practices. One of our primary focus areas is on enhancing the quality and diversity of the teacher pipeline, from recruitment to retention, with a particular emphasis on teacher preparation and professional development.

Overall, New America's Education Policy program supports the inclusion of the two priorities outlined in the notice (Supporting Educators and Their Professional Growth and Increasing Educator Diversity), as evidence shows that ensuring students have access not only to effective educators, but to educators who reflect their community's diversity, is essential to helping them succeed in college, career, and life overall. This is particularly important for students in high-need schools who often have the least access to effective, culturally responsive educators.

We offer several recommendations below that we believe would further strengthen the proposed priorities:

- 1) The term high-quality is used throughout the document, but is not ever defined. The Department should define the term each time it is used as it relates to the term it qualifies (e.g., high-quality preparation, high-quality professional development, etc.) so that applicants know whether their proposed project meets the priority criteria. For example, the language regarding year-long clinical teacher residencies should include the seven characteristics of high-quality residencies (e.g., that these should be paid and supervised by effective mentors, similar to high-quality medical residencies).¹ And while Section 8101(42) of the Elementary and Secondary Education Act offers a strong definition of professional development that could be a starting point, it does not include any language about the necessity of promoting culturally-responsive

¹ Roneeta Guha and Tara Kini, "Teacher Residencies: Building a High-Quality, Sustainable Workforce," *Learning Policy Institute*, Jan. 19, 2016 <https://learningpolicyinstitute.org/product/teacher-residencies-building-high-quality-sustainable-workforce>



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pedagogical practices, which have been found to boost student engagement and learning by helping students, particularly marginalized students, feel safe, valued, and understood. We urge the Department to include culturally responsive teaching practices into proposed priority 1 in part (d) as follows: “(d) Providing high-quality professional development opportunities to all educators in high-need schools (as may be defined in the program's authorizing statute or regulations) on meeting the needs of diverse learners, including students with disabilities and English learners, including by ensuring that all professional development opportunities promote culturally sustaining pedagogical practices.”

- 2) Subpoint (h) under proposed priority 2 (pg. 14) specifies that funding could be used for projects related to "Data systems and reporting structures to provide accurate, public, and timely data about the racial and other demographics of the educator workforce that can be used to support efforts to diversify the workforce and to measure progress toward teacher and school leader diversity at the State, district, or school level." We recommend that the Department clarify what is meant by "other demographics" to include gender, languages spoken (to help address the issue of linguistic diversity), and age, and expand the type of data collected beyond demographics, to incorporate other attributes of teachers that may be related to diversity and employment, including retention rate, average years of experience (overall and within their current school), pathway into the profession (e.g., traditional institution of higher education, alternative teacher residency, etc.), grade and subject taught, any extracurricular activities supervised or other duties assigned, as well as school and classroom size and student demographics. The section should also clarify that the educator workforce refers not only to in-service educators (those already working in schools) but also pre-service educators (those enrolled in a state-approved traditional or alternative educator preparation program) as these programs are the first step in ensuring a pipeline of diverse and effective educators. Data collected at the pre-service level should also include attributes of teachers disaggregated by race/ethnicity, gender, language(s) spoken, and age, including certification area pursued, average time to complete program requirements, proportion completing program requirements, etc. Finally, this section should clarify the meaning of “publicly accessible” to ensure that this information can be accessed by members of the community via the internet or a mobile phone accessible site.
- 3) Priority 2 should include a focus on recruiting, preparing, and developing teachers from the local community, including through high-quality “Grow Your Own” (GYO) Teacher approaches, defined as partnerships between educator preparation programs, school districts, and community organizations that recruit and prepare local community members (e.g., parents, paraeducators, uncertified school staff, high school students) to enter the teaching profession and teach in their communities. The five core principles of high-quality GYO programs are strong partnerships across school districts, educator preparation providers, and community organizations; recruitment of linguistically and culturally diverse candidates who are both reflective of and responsive to the needs of the local community (e.g., parents, paraeducators, uncertified school staff, high school students); wraparound supports for candidates through the



recruitment, preparation, and induction years (e.g., cohort structure, scholarships, licensure test preparation, assistance navigating college admissions process, etc.), paid work-based experience under the guidance of an effective mentor teacher that aligns with educator preparation coursework; and structured pathways for candidates to advance toward required teaching credentials and certification at various stages of their careers.² Ensuring a focus on high-quality GYO programs is critical because they offer long-term benefits to the entire community where the program is located, as they provide a pathway to a postsecondary credential and a career for the teacher candidate, teachers that understand, value, and reflect students' identities and cultures, and ultimately strengthen the social and economic well-being of the entire community.

- 4) Creating two separate priorities without clearly outlining the desired intersection of the two is a critical oversight. Right now the effectiveness priority includes many references to diversity almost as an afterthought, making it less clear what the primary intent of the priority really is. We recommend clearly separating the two priorities, with the first focused on strengthening teacher effectiveness, and the second focused on diversity. However, we urge the Department to make it clear in outlining any priorities for these grant programs that the ultimate goal is to ensure an effective AND diverse profession, and while some programs will be stronger on effectiveness, and some will be stronger on diversity, those that are strong on *both* priorities will receive the highest overall priority.
- 5) Any priority included should also include a focus on providing a plan for long-term sustainability beyond the timeframe of the grant. The education field is full of one-off policies that never met their full potential because they relied on time-delimited federal funding and oversight that ended after a few years. The Department may want to consider creating guidance that includes a list of strategies likely to lead to a more financially sustainable initiative in various areas of its EED portfolio.

Thank you for the opportunity to comment on these important grant programs to support the quality and diversity of our nation's educators. For any questions or follow up, please reach out to Jazmyne Owens, PreK-12 Policy Advisor (owens@newamerica.org).

Sincerely,

The Education Policy Program at New America

² Amaya Garcia and Jenny Muñiz, "Essential Policies and Practices for Grow Your Own Programs," *EdCentral* (blog), New America, March 18, 2019, <https://www.newamerica.org/education-policy/edcentral/essential-policies-and-practices-grow-your-own-programs/>